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10 Counsel for E. Lynn Schoenmann,
11 Chapter 7 Trustee

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PETER R. FADER
dba Urchin Capital Partners
dba Urchin Partners LLC,

Debtor.

Case No.: 08-30119-DM

Chapter 7

**FIRST INTERIM APPLICATION OF
PACHULSKI STANG ZIEHL & JONES
LLP FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES
FOR THE PERIOD SEPTEMBER 16,
2019 THROUGH NOVEMBER 28, 2022**

Hearing Date

Date: February 3, 2023
Time: 10:30 AM
Place: Courtcall/Videoconference
Judge: Honorable Dennis Montali

Objection Deadline: January 27, 2023

Pachulski Stang Ziehl & Jones LLP (“PSZJ”) submits its *First Interim Application for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period September 16, 2019 through November 28, 2022* (“Application”), for its representation of E. Lynn Schoenmann, trustee (“Trustee”) the chapter 7 estate of Peter R. Fader (“Debtor”) pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the *Guidelines for*

1 *Compensation and Expense Reimbursement of Professionals and Trustees (the “Northern District*
2 *Guidelines”), the *Guidelines for Reviewing Applications for Compensation and Reimbursement of*
3 *Expenses Filed under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases (the “UST*
4 *Guidelines”) and the Local Rules for the Northern District of California. The Application requests*
5 *an order allowing, on an interim basis, compensation to PSZJ for services and expenses incurred*
6 *from September 16, 2019 through November 28, 2022 (“Fee Period”).**

7 PSZJ seeks interim approval of fees incurred and reimbursement of expenses during the Fee
8 Period totaling \$289,259.09, as compensation for legal services in the amount of \$287,607.00 and
9 reimbursement for expenses of \$1,652.09. During the Fee Period, PSZJ wrote off approximately
10 \$11,069.00 in fees. Summary charts of fees charged and hours worked by each of PSZJ’s
11 professionals and paraprofessionals during the Fee Period are attached as Exhibit A.

12 This Application is based upon the contents hereof, together with the exhibits, the declaration
13 of Kenneth Brown filed concurrently herewith, the pleadings, papers, and records on file in this case,
14 and any evidence or argument that the Court may entertain at the time of the hearing on the
15 Application.

16 **I.**

17 **SUMMARY SHEET OF FEES AND EXPENSE REQUEST**

Name of Applicant:	Pachulski Stang Ziehl & Jones
Authorized to Provide Professional Services to:	E. Lynn Shoemann, chapter 7 trustee
Retention Date:	September 26, 2019, effective as of September 16, 2019
Prior Interim Fee Applications:	None
Time period covered by this Application:	September 16, 2019 to November 28, 2022
Total professional hours covered by this Application	288.70
Total professional fees requested in this Application:	\$287,607.00
Reimbursable expenses sought in this Application	\$1,652.09

Name of Professional, Current Hourly Rate and Date of Admission:	Kenneth Brown, \$1,395 admitted 1981 Miriam Manning, \$895 admitted 1995
Blended Hourly Rate During Fee Period:	\$1,004.37

II.

GENERAL BACKGROUND

A. The Debtor's Bankruptcy Filing

On January 26, 2008, the Debtor filed a voluntary chapter 7 petition. The Debtor received a discharge and the case was closed in 2010.

On July 14, 2019, the Debtor filed an application to reopen the case to disclose claims that were omitted from his schedules and to enable a trustee to determine whether the claims were property of the estate. The claims arose from Steven R. Boal's ("Boal") promises to pay the Debtor for raising capital for two of Boal's companies Quotient Technology, Inc. ("Quotient") and CashStar, Inc. ("Cashstar") ("Claims"). The Debtor claimed that based on these promises, he raised millions of dollars for Quotient and CashStar but when he requested payment, Boal refused.

On September 15, 2019 the Debtor's bankruptcy case was reopened to enable the Trustee to investigate and possibly pursue the Claims for the benefit of the estate and its creditors.

B. Retention of PSZJ

On September 19, 2019, PSJ filed an *Application of the Chapter 7 Trustee for Order Approving Employment of Pachulski Stang Ziehl & Jones LLP as Counsel* [Docket No. 47]. On September 26, 2019, the Court entered its *Order Granting Application of the Chapter 7 Trustee for Order Approving Employment of Pachulski Stang Ziehl & Jones LLP as Counsel* [Docket No. 50] (“Retention Order”). A true copy of the Retention Order is attached hereto as **Exhibit B**.

From the outset of this representation, PSZJ had significant risk of non-payment. The Claims, which were the only asset of the estate, were based on decades old oral agreements and Mr. Fader's credibility and veracity was challenged by the defendants. Despite these risks and significant challenges, after nearly two years of litigation, during which time PSZJ has not been paid

1 anything by the estate, the Trustee's professionals were able to achieve and obtain Court approval of
2 a settlement which will result in a meaningful distribution to creditors.

3 **C. Retention of Contingency Fee Litigation Counsel**

4 On November 13, 2019, the Court entered an order approving the Trustee's retention of the
5 Meade Firm P.C. and Dontzin Nagy & Fleissig LLP as special litigation counsel ("Special
6 Counsel") to prosecute the Claims on a contingency fee basis pursuant to sections 327(a) and 328.

7 **D. Litigation Sharing Agreement**

8 The Debtor contended that he had rights to the Claims because they arose, in part, post-
9 petition. To resolve the dispute over the ownership of the Claims, the Debtor and the Trustee
10 negotiated and ultimately achieved a Litigation Recovery Sharing Agreement ("Sharing
11 Agreement") which provides the Debtor with 40% of the net proceeds recovered from the Trustee's
12 prosecution of the Claims and 60% to the estate, after payment of all allowed chapter 7
13 administrative expenses and allowed domestic support obligations identified in 11 U.S.C.
14 §507(a)(1)(A) and (B). On February 6, 2020, the Bankruptcy Court approved the Sharing
15 Agreement.

16 **E. The Litigation and Settlement**

17 The Trustee's investigation of the Claims revealed that they were colorable. On December 9,
18 2019 a complaint was filed in the Santa Clara County Superior Court against Boal and Quotient
19 alleging claims for breach of oral contracts, breach of fiduciary duties, and for imposition of a
20 constructive trust, declaratory relief, and an accounting. Boal removed the complaint to the United
21 States District Court for the Northern District of California and the case was referred to the
22 Bankruptcy Court where it is currently pending as Adversary Proceeding No. 20-03007 ("Adversary
23 Proceeding").

24 In August 2022 the parties participated in mediation and agreed to settle, subject to
25 Bankruptcy Court approval. The settlement was memorialized in a *Settlement Agreement and*
26 *Release* ("Settlement Agreement" or "Settlement") in which Boal and Quotient agreed to pay the
27 estate the sum of \$5,000,000 payable in two equal installments of \$2,500,000 in consideration for a
28 full release. The releases become effective 91 days after the Trustee receives the last payment which

1 is due in March 2023. The estate retains the right to rescind the Settlement Agreement if either
2 Quotient or Boal file an insolvency proceeding at any time after entry of a final order approving the
3 Settlement Agreement and 91 days from the last payment. If the Trustee decides to rescind the
4 Settlement Agreement, all disbursements from the settlement are to be returned to the Trustee,
5 including any fees paid to PSZJ pursuant to an order approving this Application.

6 On November 10, 2022, the Court issued a *Memorandum Decision on Compromise and*
7 *Related Motions* which approved the Settlement (and related motions) and overruled the objection to
8 the Settlement that had been filed by a creditor. On November 16, 2022 the Court entered an order
9 approving the Settlement [Dkt 123].

10 On or about December 15, 2022, the Trustee received \$2,500,000 from the Settlement and
11 anticipates that the remaining \$2,500,000 will be paid in March 2023.

12 **III.**

13 **CASE STATUS**

14 The administration of the Debtor's case is largely complete now that the Adversary
15 Proceeding has settled, subject to the Trustee's right to rescind the Settlement. To date, the Trustee
16 has received \$2,500,000 from the Settlement and intends to use such funds to pay her professionals,
17 including PSZJ. The Trustee anticipates making a distribution to general unsecured creditors
18 sometime after 91 days after receipt of the second payment. The Trustee has begun reviewing the
19 general unsecured claims to determine whether objections may be appropriate.

20 **III.**

21 **PROJECT BILLING AND NARRATIVE STATEMENT OF SERVICES RENDERED**

22 In accordance with the Northern District Guidelines, the UST Guidelines and the Local
23 Rules, PSZJ classified all services performed for which compensation is sought into categories.
24 PSZJ attempted to place the services performed in the category that best relates to the service
25 provided. However, because certain services in the Debtor's chapter 7 case affected multiple
26 categories, services pertaining to one category may occasionally be included in another category.
27 PSZJ also used its best efforts to comply with the \$20,000 cap on billing categories but further
28 reducing some of the billing categories to the amount of the cap were impractical as the primary

1 category of services related to the Adversary Proceeding and mediation which resulted in the Court
2 approved settlement of the Adversary Proceeding. Accordingly, PSZJ has established the following
3 billing categories in this case to date:

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- Asset Analysis/Recovery
- Bankruptcy Litigation
- Case Administration
- Claims Admin/Objections
- Review Fee Application of Other Professionals
- Employment of Professionals
- Litigation Sharing Agreement
- Mediation and Settlement

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9 **Exhibit C** includes PSZJ's invoices for the Fee Period, which includes detailed breakdown of the
10 time entries and expenses incurred.

11 **A. Asset Analysis/Recovery**

12 Time billed to this category relates to the analysis of the potential Claims and whether they
13 constitute assets of the Debtor's bankruptcy estate that could be administered by the Trustee. During
14 the Fee Period, PSZJ, among other things conducted research into the Claims and conferred with the
15 Trustee and the Trustee's Special Counsel regarding the Claims.

16 **Total Hours 7.10/Total Fees \$6,386.50**

17 **B. Bankruptcy Litigation**

18 This category relates to work in connection with the Adversary Proceeding where PSZJ,
19 among other things: (i) participated in the review and responses to written discovery requests; (ii)
20 responded to discovery requests directed to PSZJ; (iii) advised Special Counsel and the Trustee
21 regarding challenges to the choice of forum and Boal's motion to withdraw the reference; (iv)
22 assisted drafting an opposition to Boal's motion to withdraw the reference; (v) assisted drafting a
23 stipulation regarding jury trial; (vi) analyzed the impact of Boal's withdrawal of his proofs of claim
24 on the right to a jury trial and advised Special Counsel and the Trustee; (vii) assisted drafting a letter
25 brief regarding privilege issues between the Trustee and Debtor; (viii) consulted and advised Special
26 Counsel and the Trustee regarding all aspects of the litigation and strategy; and (ix) conferred with
27 the Trustee and Special Counsel regarding initial rounds of settlement negotiations prior to the
28 mediation.

Total Hours 41.20/Total Fees \$45,451.00

C. Case Administration

This category relates to work regarding administration of this case. During the Fee Period, PSZJ, among other things: (i) conducted preliminary review of potential claims; (ii) communicated with creditors regarding the case; and (iii) drafted a motion for authority pay administrative income taxes arising from the expected payments from the Settlement of the Adversary Proceeding, the supporting declaration of the Trustee’s accountant, Jay Crom of Bachecki Crom & Company, and the memorandum of points and authorities.

Total Hours 28.20/Total Fees \$25,021.00

D. Claims Objections

Time billed to this category relates to PSZJ's negotiations with the holders of claims based on the Debtor's domestic support obligations ("DSO") who would be entitled to receive a distribution from the Settlement and obtaining Boal's withdrawal of the over \$1.4 million in claims that he had filed in the Debtor's case. Review of the DSO claims revealed that some claimants improperly sought recovery of support obligations incurred post-petition or were duplicative of claims filed by a governmental agency. These efforts reduced the amount of the DSO claims from \$572,912 to \$309,014. During the Fee Period, PSZJ, among other things: (i) reviewed the domestic support obligation claims; (ii) communicated with the holders of the DSO claim regarding the calculation of their claims and the Code's treatment of DSO claims; (iii) researched various issues regarding the Code's treatment of pre and post-petition DSO claims and related issues; (iv) drafted stipulations or notices of withdrawal or amendments to the DSO claims so that they would only include non-duplicative, pre-petition amounts due; (v) communicated with the Trustee regarding the resolution of such claims; (vi) negotiated with Boal for the dismissal of the claims he filed in the Debtor's case; and (vii) evaluated the impact of Boal's withdrawal of the claims on the pending Adversary Proceeding and communicated with Boal's counsel re same.

Total Hours 38.80/Total Fees \$30,298.50

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1 **E. Fee Applications of Others**

2 PSZJ assisted Special Counsel with the preparation of its fee application and conferred with
3 counsel regarding compliance with the guidelines for the Northern District of California.

4 **Total Hours 5.30/Total Fees \$3,622.00**

5 **F. Employment of Professionals**

6 The Trustee required the assistance of Special Counsel to prosecute the Claims on a
7 contingency fee. PSZJ, among other things: (i) prepared PSZJ's employment application and
8 declaration; (ii) assisted the Trustee in selecting Special Counsel; (iii) prepared the application and
9 assisting with the preparation supporting declarations for the retention of the Meade Firm P.C. and
10 Dontzin Nagy & Fleissig LLP to prosecute the Claims on a contingency fee basis pursuant to 11
11 U.S.C. section 328; (iv) reviewed and analyzed various issues regarding the employment of Special
12 Counsel; (v) reviewed and revised the terms of Special Counsel's retention agreement; (vi) advised
13 the Trustee with respect to the proposed terms of the retention; and (vii) conferred with both Special
14 Counsel and the Trustee regarding the terms of Special Counsel's retention to ensure compliance
15 with the requirements of the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules,
16 and the Office of the United States Trustee.

17 **Total Hours 19.70/Total Fees \$17,509.00**

18 **G. Litigation Sharing Agreement**

19 The time billed to this category include PSZJ's work to resolve the dispute with the Debtor
20 over the ownership of the Claims and the sharing of the proceeds realized from the Trustee's
21 prosecution of the Claims. PSZJ's efforts resulted in the Court approved Sharing Agreement.
22 During the Fee Period, PSZJ, among other things: (i) conferred extensively with the Debtor's
23 counsel, the Trustee and Special Counsel in an effort to settle the dispute involving the Debtor's
24 contention that he owned the Claims and to devise a reasonable apportionment of the proceeds of
25 any settlement or judgment that would be obtained from the prosecution of the Claims; (ii) drafted
26 the motion to approve the Sharing Agreement, the supporting declarations of the Trustee and Tyler
27 Meade; and (iii) prepared a reply brief in response to the opposition filed by Boal and prepared for
28

1 and attended the hearing on the motion to approve the Sharing Agreement. The Sharing Agreement
2 was approved by the Court on February 5, 2020 over Mr. Boal's objection.

3 **Total Hours 50.30/Total Fees \$44,396.50**

4 **H. Mediation and Settlement**

5 In connection with the resolution of the Claims through the Adversary Proceeding, where
6 PSZJ, among other things: (i) participated in the mediation in an effort to facilitate a settlement; (ii)
7 assisted with the drafting of the mediation statement; (iii) drafted the Rule 9019 motion to settle the
8 Adversary Proceeding, the supporting declarations of the Trustee and Special Counsel, the notice
9 and the points and authorities in support of the motion; (iv) conferred extensively with the Trustee
10 and her accountant regarding the calculation of the potential distributions to be made pursuant to the
11 Sharing Agreement and the impact on the estate; (v) conferred extensively with the Trustee, her
12 accountant and Special Counsel regarding various revisions to the proposed settlement and Rule
13 9019 motion to include staggered payments and the impact on the estate and creditors of those
14 revisions; and (vi) drafted responses to the objections to the proposed settlement asserted by the
15 Debtor and creditor. The Settlement was approved by the Court on November 16, 2022.

16 **Total Hours 98.10/Total Fees \$114,922.50**

17 **I. PSZJ Fee Application**

18 This Application does not include any time billed by counsel for the preparation of this
19 Application. Such fee requests will be included in PSZJ's subsequent fee application.

20 **J. Voluntary Reduction**

21 During the course of the Fee Period, PSZJ wrote off approximately \$11,069.00 in fees,
22 representing an approximate 4% reduction of the total fees requested.

23 **K. List of Expenses by Category**

24 PSZJ advanced costs in connection with the performance of the services described in this
25 Application. During the Fee Period, PSZJ incurred a total of \$1,652.09 in expenses. PSZJ made
26 every effort to keep the costs in this case to a minimum.

27 PSZJ customarily charges \$0.20 per page for photocopying expenses, as well as \$0.10 per
28 page for scanning and copying expenses. PSZJ's photocopying machines automatically record the

1 number of copies made when the person that is doing the copying enters the client's account number
2 into a device attached to the photocopier. PSZJ summarizes each client's photocopying charges on a
3 daily basis. Whenever feasible, PSZJ sends large copying projects to an outside copy service that
4 charges a reduced rate for photocopying.

5 Regarding providers of on-line legal research (e.g., LEXIS and Westlaw), PSZJ charges the
6 standard usage rates these providers charge for computerized legal research. PSZJ bills its clients
7 the actual amount charged by such services, with no premium. Any volume discount received by
8 PSZJ is passed on to the client. PSZJ does not charge for local or long distance calls placed by
9 attorneys from their offices. PSZJ only bills its clients for the actual costs charged to PSZJ by
10 teleconferencing services in the event that a multiple party teleconference is initiated through PSZJ.

11 **L. Hourly Rates**

12 The hourly rates of all professionals and paraprofessionals rendering services in this case are
13 set forth on the Billing Summary Chart on **Exhibit A** annexed hereto.

14 **M. Professionals and Paraprofessionals**

15 The biographies of the attorneys and paraprofessionals who have worked on this matter and
16 a description of their professional experience and education are attached hereto as **Exhibit D**. PSZJ
17 has no understanding, agreement, or arrangement of any kind to divide with or pay to anyone any of
18 the fees to be awarded in these proceedings, except to be shared among members of PSZJ.

19 **N. Client Review of Billing Statements**

20 Pursuant to the Northern District Guidelines, a cover letter enclosing this Application is
21 being sent to the Trustee concurrently. The letter invites the Trustee to discuss with PSZJ and/or
22 the Office of the United States Trustee any objections, concerns, or questions the Trustee may have
23 with regard to the requested compensation and reimbursement set forth in the Application. A copy
24 of the transmittal letter is attached hereto as **Exhibit E**.

25 **O. Notice of Application and Hearing**

26 Notice of the submission of this Application and the hearing thereon will be provided to the
27 Office of the United States Trustee, the Debtor, all creditors, all parties requesting special notice
28 and other interested parties in accordance with the Local Rules. Complete copies of the Application

1 will be provided to those parties who have requested special notice and to any other party upon
2 specific request. Therefore, notice should be deemed adequate under the circumstances and in
3 accordance with Federal Bankruptcy Rules 2002(a)(6) and 2002(c)(2).

4 **IV.**

5 **THE FEES AND EXPENSES REQUESTED SHOULD BE AWARDED**

6 Section 331 of the Bankruptcy Code provides for interim and final compensation of
7 professionals and incorporates the substantive standards of section 330 to govern the Court's award
8 of such compensation. 11 U.S.C. § 331. Section 330 of the Bankruptcy Code provides that after
9 notice and hearing a Court may award a professional employed under section 327 of the Bankruptcy
10 Code "reasonable compensation for actual, necessary services rendered [and] reimbursement for
11 actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330 also sets forth six, non-exclusive
12 factors that are to be considered in determining the amount of reasonable compensation to be
13 awarded to a professional, including:

14 (A) the time spent on such services;
15 (B) the rates charged for such services;
16 (C) whether the services were necessary to the administration of, or beneficial at the time at
17 which the service was rendered toward the completion of, a case under this title;
18 (D) whether the services were performed within a reasonable amount of time commensurate
19 with the complexity, importance, and nature of the problem, issue, or task addressed; and
20 (E) with respect to a professional person, whether the person is board certified or otherwise
has demonstrated skill and experience in the bankruptcy field; and
21 (F) whether the compensation is reasonable based on the customary compensation charged
by comparably skilled practitioners in cases other than cases under this title

22 *Id.* § 330(a)(3).

23 The Ninth Circuit has recognized that a compensation award based on a reasonable hourly
24 rate multiplied by the number of hours actually and reasonably expended is presumptively a
25 reasonable fee. *In Re Manoa Finance Company*, 853 F.2d 687, 689 (9th Cir. 1988).

26 PSZJ submits that the services for which it seeks compensation and the expenses for which
27 it seeks reimbursement in this Application were necessary and beneficial to the orderly
28 administration of the estate and the maximization of value for creditors of the Debtor's chapter 7
case. The compensation requested is reasonable and appropriate in light of the nature, extent, and

1 value of such services to the Trustee which culminated in the settlement of decades old claims for
2 \$5 million dollars. In addition to performing professional services expediently and efficiently,
3 PSZJ also wrote off approximately \$11,069.00 in fees in an effort to further preserve estate
4 resources. The PSZJ's blended hourly rate in these cases for the Fee Period excluding
5 paraprofessionals is \$1,004.37.

6 Time and labor devoted is only one of many pertinent factors in determining an award of
7 fees and costs. Based on the skills brought to bear in these cases by PSZJ and the \$5 million
8 settlement obtained in the Adversary Proceeding, and in light of the accepted lodestar approach,
9 PSZJ submits that the compensation requested herein is reasonable and appropriate. PSZJ's efforts
10 were essential to achieving the settlement of a hotly contested Adversary Proceeding, the sizeable
11 reduction and resolution of the DSO claims that are to be paid from the Settlement proceeds, and
12 the near completion of administration of the estate.

13 The time for which compensation is sought is detailed in PSZJ's professional fee statements
14 contained in Exhibit C attached hereto. PSZJ's services and time expenditures are reasonable in
15 light of the labor required and outcome achieved in this case. PSZJ's charges for its professional
16 services are based upon the time, nature, extent, and value of such services and the cost of
17 comparable services in both California and national markets, other than in a case under the
18 Bankruptcy Code. The compensation PSZJ seeks by way of this Application is the customary
19 compensation commonly sought by PSZJ and other professionals representing trustees, committees,
20 and debtors in similar circumstances.

21 The services rendered by PSZJ were necessary and beneficial to the Debtor's estate and
22 were consistently performed in a timely manner commensurate with the complexity, importance,
23 and nature of the issues involved. Accordingly, approval of the compensation for professional
24 services and reimbursement of expenses sought herein is warranted and should be approved.

25 **V.**

26 **CONCLUSION**

27 The compensation presently sought by PSZJ is interim and payable from the proceeds of the
28 first Settlement payment of \$2,500,000. Neither PSZJ, nor any partners or associates of PSZJ, have

1 any agreement or any understanding of any kind or nature to divide, pay over, or share any portion
2 of the fees to be awarded PSZJ with any other person or attorney, except among shareholders and
3 associates of PSZJ.

4 PSZJ believes that the services rendered for which compensation is sought in this
5 Application have been beneficial to the estate, that the costs incurred have been necessary and
6 proper, and that the sums requested for the services rendered and the costs incurred are fair and
7 reasonable.

8 **WHEREFORE**, PSZJ respectfully requests that this Court (a) authorize allowance and
9 direct payment of fees and costs, and (b) award interim compensation, as follows:

10 1. Allow interim compensation to be paid to PSZJ (subject to disgorgement as
11 necessary pursuant to the Settlement) in the total amount of \$289,259.09, representing \$287,607.00
12 of fees incurred for the period between September 16, 2019 through November 28, 2022 and
13 \$1,652.09 of expenses incurred for the same period; and

14 2. Grant such other and further relief as may be appropriate under the circumstances.

15 Dated: January 11, 2023

PACHULSKI STANG ZIEHL & JONES LLP

16 By: /s/ Kenneth H. Brown

17 Kenneth H. Brown

18 Miriam Manning

19 Counsel for E. Lynn Schoenmann,
Chapter 7 Trustee

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA

EXHIBIT A

Pachulski Stang Ziehl & Jones LLP

One Sansome Street
34th Floor, Suite 3430
San Francisco, CA 94104

November 28, 2022

Invoice 131291

Client 77354

Matter 00001

KHB

E. Lynn Schoenmann
35 Miller Avenue ste. 298
Mill Valley, CA 94941

RE: Ch. 7 Trustee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/28/2022

FEES	\$287,607.00
EXPENSES	\$1,652.09
TOTAL CURRENT CHARGES	\$289,259.09
TOTAL BALANCE DUE	\$289,259.09

Pachulski Stang Ziehl & Jones LLP
Schoenmann, E. Lynn (Fader)
77354 -00001

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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
HCK	Kevane, Henry C.	Partner	1025.00	0.50	\$512.50
KHB	Brown, Kenneth H.	Partner	0.00	0.50	\$0.00
KHB	Brown, Kenneth H.	Partner	695.00	0.20	\$139.00
KHB	Brown, Kenneth H.	Partner	975.00	31.60	\$30,810.00
KHB	Brown, Kenneth H.	Partner	995.00	41.80	\$41,591.00
KHB	Brown, Kenneth H.	Partner	1225.00	11.30	\$13,842.50
KHB	Brown, Kenneth H.	Partner	1395.00	74.80	\$104,346.00
LAF	Forrester, Leslie A.	Other	0.00	0.80	\$0.00
LAF	Forrester, Leslie A.	Other	425.00	1.10	\$467.50
MPK	Manning , Miriam	Counsel	0.00	11.80	\$0.00
MPK	Manning , Miriam	Counsel	775.00	30.70	\$23,792.50
MPK	Manning , Miriam	Counsel	795.00	19.30	\$15,343.50
MPK	Manning , Miriam	Counsel	850.00	0.80	\$680.00
MPK	Manning , Miriam	Counsel	895.00	62.00	\$55,490.00
PJJ	Jeffries, Patricia J.	Paralegal	395.00	1.50	\$592.50
				288.70	\$287,607.00

Pachulski Stang Ziehl & Jones LLP
Schoenmann, E. Lynn (Fader)
77354 -00001

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	7.10	\$6,386.50
BL	Bankruptcy Litigation [L430]	41.20	\$45,451.00
CA	Case Administration [B110]	28.20	\$25,021.00
CO	Claims Admin/Objections[B310]	38.80	\$30,298.50
CP03	Review Fee App of Other Prof.	5.30	\$3,622.00
EMP	Employment of Professionals	19.70	\$17,509.00
LSA	Litigation Sharing Agreement	50.30	\$44,396.50
ME	Mediation	98.10	\$114,922.50
		288.70	\$287,607.00

Pachulski Stang Ziehl & Jones LLP
Schoenmann, E. Lynn (Fader)
77354 -00001

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November 28, 2022

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Auto Travel Expense [E109]	\$14.25
Conference Call [E105]	\$19.49
CourtLink	\$13.79
Lexis/Nexis- Legal Research [E	\$435.46
Outside Services	\$127.50
Pacer - Court Research	\$220.90
Postage [E108]	\$318.30
Reproduction Expense [E101]	\$119.80
Reproduction/ Scan Copy	\$341.20
Transcript [E116]	\$41.40
	<hr/>
	\$1,652.09

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA

EXHIBIT B



1 Kenneth H. Brown (CA Bar No. 100396)
2 Miriam Manning (CA Bar No. 178584)
3 PACHULSKI STANG ZIEHL & JONES LLP
4 150 California Street, 15th Floor
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Signed and Filed: September 26, 2019


DENNIS MONTALI
U.S. Bankruptcy Judge

1 [Proposed] Counsel for E. Lynn Schoenmann,
2 Chapter 7 Trustee

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5 UNITED STATES BANKRUPTCY COURT
6
7 NORTHERN DISTRICT OF CALIFORNIA
8
9
10 SAN FRANCISCO DIVISION

11 In re:

12 PETER R. FADER
13 dba Urchin Capital Partners
14 dba Urchin Partners LLC,

15 Debtor.

16 Case No.: 08-30119-DM

17 Chapter 7

18 **ORDER GRANTING APPLICATION
19 OF THE CHAPTER 7 TRUSTEE FOR
20 ORDER APPROVING EMPLOYMENT
21 OF PACHULSKI STANG ZIEHL &
22 JONES LLP AS COUNSEL**

23 [No Hearing Required]

24 The Court has considered the *Application of the Chapter 7 Trustee for Order Approving*
25 *Employment of Pachulski Stang Ziehl & Jones LLP as Counsel* (the “Application”) filed by E. Lynn
26 Shoenmann, Chapter 7 Trustee (the “Trustee”), and the Declaration of Kenneth H. Brown in
27 support thereof filed on [Docket No. 47]. Based upon the record before the Court, it appears that
28 Pachulski Stang Ziehl & Jones LLP (“PSZ&J”) does not hold or represent any interest adverse to
the estates in the matters on which it is to be employed, that PSZ&J is a disinterested person, that its
employment is in the best interest of the estates, and that no hearing on the Application is required.
Accordingly, it is hereby:

29 **ORDERED** that the Trustee is authorized to employ PSZ&J as its general bankruptcy
30 counsel herein on all matters identified in the Application, on the terms and conditions set forth
31 more fully in the Application, effective as of September 16, 2019. In particular, the employment

1 arrangement approved herein contemplates that, subject to Court approval of an appropriate fee
2 application or applications by PSZ&J, the Trustee will compensate PSZ&J at its customary hourly
3 rates in effect from time to time and reimburse PSZ&J for its expenses according to its customary
4 reimbursement policies.

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6 ****END OF ORDER****
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COURT SERVICE LIST

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA

EXHIBIT C

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
09/18/2019	KHB	AA	Review authorities re whether claims are property of estate.	0.30	975.00	\$292.50
09/18/2019	MPK	AA	Conduct research on whether claim is property of the estate and draft email to K. Brown re same.	2.40	775.00	\$1,860.00
09/20/2019	KHB	AA	Emails with Trustee and counsel for Debtor re meeting with contingency fee counsel.	0.20	975.00	\$195.00
09/25/2019	KHB	AA	Telephone call Marc Levinson re Debtor's undisclosed claims and retention of contingency fee counsel.	0.20	975.00	\$195.00
09/25/2019	KHB	AA	Emails with Trustee re same.	0.20	975.00	\$195.00
09/26/2019	KHB	AA	Meet with Trustee and contingency fee counsel re claims against Boal.	1.20	975.00	\$1,170.00
09/26/2019	KHB	AA	Meet with Trustee re prosecution of claims against Boal.	0.50	975.00	\$487.50
09/26/2019	KHB	AA	Telephone calls with Marc Levinson, counsel for the Debtor re prosecution of Boal claims.	0.20	975.00	\$195.00
09/26/2019	KHB	AA	Analyze authority re Debtor's participation in recovery.	0.80	975.00	\$780.00
09/26/2019	KHB	AA	Email to Marc Levinson re Boal litigation issues and Debtor's assistance.	0.30	975.00	\$292.50
09/29/2019	KHB	AA	Confer with Trustee re prosecution of undisclosed claims and role / interest of Debtor.	0.40	975.00	\$390.00
09/29/2019	KHB	AA	Emails with Trustee re prosecution of undisclosed claims and role / interest of Debtor.	0.20	975.00	\$195.00
10/08/2019	KHB	AA	Call with T. Meade re Fader/Boal litigation.	0.20	695.00	\$139.00
				7.10		\$6,386.50

Bankruptcy Litigation [L430]

11/13/2019	KHB	BL	Telephone call with T. Meade re Boel litigation issues.	0.20	975.00	\$195.00
11/18/2019	MPK	BL	Email to K. Brown re litigation issues.	0.10	775.00	\$77.50
11/21/2019	KHB	BL	Emails with Tyler Meade re Boel complaint.	0.10	975.00	\$97.50
12/02/2019	KHB	BL	Review and revise Boel complaint.	2.00	975.00	\$1,950.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/03/2019	KHB	BL	Telephone call with T. Meade re Boel complaint.	0.20	975.00	\$195.00
12/03/2019	KHB	BL	Email to Trustee re timing for filing complaint.	0.10	975.00	\$97.50
12/09/2019	KHB	BL	Email with T. Meade re Boel complaint.	0.20	975.00	\$195.00
12/09/2019	KHB	BL	Emails with Marc Colon re split with Fader.	0.20	975.00	\$195.00
12/17/2019	KHB	BL	Emails with M. Levinson re POC's filed by Boels and impact on litigation.	0.20	975.00	\$195.00
12/18/2019	KHB	BL	Telephone calls with T. Meade and M. Levinson re impact of Boel POC on Boel litigation.	0.30	975.00	\$292.50
12/19/2019	KHB	BL	Telephone call with T. Meade & Trustee re peremptory challenge.	0.20	975.00	\$195.00
12/19/2019	KHB	BL	Review peremptory challenge.	0.10	975.00	\$97.50
01/08/2020	KHB	BL	Emails with T. Meade re Fader litigation.	0.20	995.00	\$199.00
01/14/2020	KHB	BL	Emails with T. Meade re removal and remand.	0.30	995.00	\$298.50
01/16/2020	KHB	BL	Telephone call with T. Meade re Boel litigation, remand motion and peremptory challenge.	0.20	995.00	\$199.00
01/17/2020	KHB	BL	Emails with T. Meade re required filing of certificate of association in district court.	0.20	995.00	\$199.00
01/27/2020	KHB	BL	Call with T. Meade, Marc Levinson and M. Manning re reply brief.	0.60	995.00	\$597.00
01/28/2020	KHB	BL	Emails from M. Levinson re reply brief.	0.20	995.00	\$199.00
01/31/2020	KHB	BL	Emails with T. Meade re remand.	0.20	995.00	\$199.00
01/31/2020	KHB	BL	Meet with M. Levinson and T. Meade in preparation for hearing.	0.50	995.00	\$497.50
01/31/2020	KHB	BL	Emails to Trustee re results of hearing.	0.10	995.00	\$99.50
01/31/2020	KHB	BL	Work on order and email to Boel's counsel.	0.40	995.00	\$398.00
01/31/2020	KHB	BL	Travel to / from hearing on motion to approve sharing agreement.	0.60	995.00	\$597.00
01/31/2020	KHB	BL	Email to M. Manning re proposed order.	0.10	995.00	\$99.50
02/03/2020	KHB	BL	Review authority re removal and remand.	0.40	995.00	\$398.00
02/03/2020	KHB	BL	Emails with T. Meade and Tibor Nagay re Remand / Removal.	0.50	995.00	\$497.50
02/03/2020	KHB	BL	Conference with Tibor Nagay re withdrawal of	0.40	995.00	\$398.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			reference.			
02/03/2020	KHB	BL	Review and respond to emails re withdrawal of reference.	0.20	995.00	\$199.00
02/03/2020	KHB	BL	Emails with T. Meade re removal and remand.	0.20	995.00	\$199.00
02/04/2020	KHB	BL	Review authority re withdrawal of reference and review and respond to email from Tibor Nagay re same.	0.80	995.00	\$796.00
02/05/2020	KHB	BL	Emails from T. Meade re remand and withdrawal of the reference.	0.20	995.00	\$199.00
02/06/2020	KHB	BL	Emails and telephone calls with Tyler Fader re informing Motali of Boels declining to stipulate to keeping case in bankruptcy court.	0.20	995.00	\$199.00
02/11/2020	KHB	BL	Review and revise application for extension of time to respond to motion to dismiss.	1.00	995.00	\$995.00
02/13/2020	KHB	BL	Emails with T. Meade re withdraw reference.	0.20	995.00	\$199.00
02/24/2020	KHB	BL	Review and respond to inquiry from special counsel re order / procedures re reference to Bankruptcy Court.	0.20	995.00	\$199.00
02/26/2020	KHB	BL	Email to special counsel re Rule 9027 (e)(3) requirements.	0.20	995.00	\$199.00
02/27/2020	KHB	BL	Emails with special counsel re removal issues.	0.20	995.00	\$199.00
02/28/2020	MPK	BL	Emails regarding Boal litigation (.1); revise 9027 statement (.1)	0.20	795.00	\$159.00
02/28/2020	KHB	BL	Review and revise Rule 9027(e)(3) statement.	0.20	995.00	\$199.00
02/28/2020	KHB	BL	Emails re Rule 9027 (e)(3) statement with special counsel.	0.10	995.00	\$99.50
03/06/2020	KHB	BL	Review and respond to email from S. Popanik re opposition to motion to withdraw reference.	0.30	995.00	\$298.50
03/18/2020	KHB	BL	Review and revise opposition to motion to withdraw reference.	1.20	995.00	\$1,194.00
03/19/2020	KHB	BL	Emails with special counsel re opposition to motion to withdraw reference.	0.20	995.00	\$199.00
07/08/2020	MPK	BL	Email to K. Brown regarding status of Quotient litigation (.1); review filings in AP (.1)	0.20	795.00	\$159.00
07/30/2020	KHB	BL	Work on opposition to motion to dismiss.	1.20	995.00	\$1,194.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/07/2020	KHB	BL	Review status report from T. Meade; emails from Trustee re same.	0.30	995.00	\$298.50
08/31/2020	KHB	BL	Emails with counsel for Fader re status of litigation.	0.30	995.00	\$298.50
08/31/2020	MPK	BL	Emails with Orrick regarding status of litigation.	0.10	795.00	\$79.50
11/01/2020	KHB	BL	Review opinion on motion to dismiss and email to /from T. Meade and Trustee re same.	0.60	995.00	\$597.00
11/17/2020	KHB	BL	Confer with T. Meade and Trustee Boel Litigation strategy and discovery procedure under Bankruptcy Rules.	0.30	995.00	\$298.50
11/23/2020	MPK	BL	Review memorandum and confirm docket re status conference (.6); email to K. Brown re same (.1)	0.70	795.00	\$556.50
12/08/2020	KHB	BL	Emails with special counsel and M. Manning re stipulation or objection to Boel motion to withdraw claims.	0.60	995.00	\$597.00
12/08/2020	MPK	BL	Emails regarding discovery and disclosures (.1); review and revise rule 26 disclosures (.3); review AP docket (.1); review and revise order granting motion to dismiss (.3)	0.80	795.00	\$636.00
12/09/2020	MPK	BL	Email to special counsel regarding proposed order on MTC and local rules (.3)	0.30	795.00	\$238.50
12/11/2020	KHB	BL	Review CMC statement and initial disclosures and emails with Special Counsel re same.	0.40	995.00	\$398.00
12/11/2020	MPK	BL	Email to T. Meade regarding CMC statement.	0.20	795.00	\$159.00
12/15/2020	KHB	BL	Email from Asher Lowenstein re common interest privilege (.2); emails from M. Manning re same (.2).	0.40	995.00	\$398.00
12/15/2020	MPK	BL	Emails with special counsel regarding privilege issues.	0.30	795.00	\$238.50
12/16/2020	MPK	BL	Email to special counsel regarding hearing and review docket in main and AP (.1)	0.10	795.00	\$79.50
12/18/2020	KHB	BL	Work on responses to discovery requests to Trustee (.4); confer with Trustee and T. Meade re same and re litigation status (.5).	0.90	995.00	\$895.50
01/25/2021	KHB	BL	Emails with A. Lowenstein re discovery responses (.2); emails with Trustee re same (.1).	0.30	1225.00	\$367.50
01/27/2021	KHB	BL	Confer with Tibor Nagay and T. Meade and Lynn Schoenmann re status of Boel litigation and discovery issues.	0.60	1225.00	\$735.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/28/2021	KHB	BL	Emails with A. Lowenstein re discovery issues (.2); emails with Trustee re same (.2).	0.40	1225.00	\$490.00
03/12/2021	MPK	BL	Emails to counsel for non-party witness regarding discovery and subpoena.	0.20	850.00	\$170.00
04/12/2021	KHB	BL	Email from counsel for Myron Wick re discovery issues.	0.20	1225.00	\$245.00
04/12/2021	MPK	BL	Review production by Myron Wicks (.2); email to litigation counsel regarding the same (.2)	0.40	850.00	\$340.00
04/15/2021	KHB	BL	Review and revise letter brief on privilege issues relating to communications between Trustee and Debtor (.5); review Boel motion to compel (.4).	0.90	1225.00	\$1,102.50
04/15/2021	MPK	BL	Emails regarding discovery dispute and email to creditor re status of case.	0.10	850.00	\$85.00
04/21/2021	KHB	BL	Review order concerning privilege log (.2); emails with A. Lowenstein re need for emails re sharing agreement (.2); review letter brief on motion to compel (.2).	0.60	1225.00	\$735.00
04/21/2021	MPK	BL	Email with K. Brown regarding discovery dispute; review discovery order and emails/letters from Boal.	0.10	850.00	\$85.00
04/22/2021	KHB	BL	Review and retrieve emails with Boel's counsel re sharing agreement for transmission to A. Lowenstein to comply with court order.	1.00	1225.00	\$1,225.00
05/05/2021	KHB	BL	Emails with A. Lowenstein re document production.	0.20	1225.00	\$245.00
05/18/2021	KHB	BL	Confer with Dan Linchey re contact by defense counsel.	0.20	1225.00	\$245.00
06/30/2021	KHB	BL	Emails from Special Counsel re discovery issues and obtaining declaration from Trustee re same (.3); review letter from Boel's counsel re discovery demands (.1); review proposed declaration by Trustee (.1); emails with Trustee re same (.2).	0.70	1225.00	\$857.50
07/09/2021	KHB	BL	Telephone call special council re discovery issues (.2); confer with T. Nagay, T. Mead and Trustee re discovery issues (.9); confer with R. Pachulski re same (.3); emails with Nagay, Mead and Trustee re same (.4).	1.80	1225.00	\$2,205.00
07/12/2021	KHB	BL	Confer with T. Meade, T. Nagay and Trustee re litigation strategy and discovery issues (.7); emails with Trustee re same (.2).	0.90	1225.00	\$1,102.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2021	KHB	BL	Confer with Trustee and L.Kieve re Boal litigation (.5); review sharing agreement, Boal claim withdrawal, claims docket and applicable authority and emails with Trustee re same (.8).	1.30	1225.00	\$1,592.50
07/22/2021	KHB	BL	Confer with Trustee re Schoenmann re discovery issues (.3).	0.30	1225.00	\$367.50
07/27/2021	KHB	BL	Email from with Trustee re discovery issues (.2); confer with Trustee and special counsel re discovery issues (.4); emails from Special Counsel re same (.2).	0.80	1225.00	\$980.00
09/15/2021	KHB	BL	Review responses to discovery requests and email to T. Appleton re same.	0.50	1225.00	\$612.50
02/02/2022	KHB	BL	Emails from Seena Forouzan re results of discovery motions and court's order re supplemental discovery (.2); emails with M. Manning re communications with creditors and supplemental discovery requirements. (.2).	0.40	1395.00	\$558.00
02/02/2022	MPK	BL	Email to K. Brown regarding discovery in Boal litigation (.1); review trustee's discovery responses (.2); email to Seena at Meade firm regarding supplemental discovery responses (.2).	0.50	895.00	\$447.50
03/16/2022	KHB	BL	Email from T. Meade and Trustee re status report and discovery and summary judgment issues.	0.50	1395.00	\$697.50
03/17/2022	KHB	BL	Confer with T. Meade re litigation strategy and discovery issues.	0.30	1395.00	\$418.50
03/31/2022	KHB	BL	Emails with Special Counsel re Quotient discovery issues.	0.30	1395.00	\$418.50
05/27/2022	KHB	BL	Emails from T. Mead re settlement discussions with Boel (.2); review settlement payment waterfall analysis (.2); confer with T. Meade, T. Nagay and L. Schoenmann re settlement (1.0); confer with L. Schoenmann re settlement (.2).	1.60	1395.00	\$2,232.00
06/01/2022	KHB	BL	Confer with T. Meade and L. Schoenmann re Boel Settlement (.5); work on letter to Elliot Peterson re settlement demand (.5).	1.00	1395.00	\$1,395.00
06/02/2022	KHB	BL	Confer with T. Mead and Lynn Schoenmann re settlement of Boel litigation (.6); confer with T. Mead re settlement of Boel litigation (.2); confer with L. Schoenmann re settlement of Boel litigation (.1); emails and telephone call with L. Kieve re settlement issues (.4).	1.30	1395.00	\$1,813.50

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06/06/2022	KHB	BL	Call with T. Meade, T. Nagay, L. Schoenmann re response to E. Peters email (.3); review E. Peters email (.2).	0.50	1395.00	\$697.50
06/09/2022	KHB	BL	Confer with T. Meade, T. Nagay and L. Schoenmann re settlement with Boel.	0.40	1395.00	\$558.00
07/25/2022	KHB	BL	Emails with T. Meade re response to K. Brown deposition subpoena and motion to quash (.2); review subpoena (.2).	0.40	1395.00	\$558.00
07/26/2022	KHB	BL	Confer with T. Meade re mediation issues and motion to quash K. Brown subpoena.	0.20	1395.00	\$279.00
09/27/2022	KHB	BL	Emails with T. Meade and trustee re transmission of estimated distribution waterfall to Fader.	0.20	1395.00	\$279.00
				41.20		\$45,451.00

Case Administration [B110]

09/16/2019	HCK	CA	Memos to / from M. Levinson and K. Brown re L. Schoenmann reopened Chapter 7 case (9/13) and confer with K. Brown re same.	0.50	1025.00	\$512.50
09/16/2019	LAF	CA	Legal research re: Judicial estoppel and failure to disclose claim.	0.80	425.00	\$340.00
09/18/2019	PJJ	CA	Conduct research regarding 9th circuit case law regarding section 541.	0.20	395.00	\$79.00
09/19/2019	MPK	CA	Email to K. Brown regarding case law (.8); call to Trustee's office regarding employment application (.1); research judicial estoppel issues (1.8)	2.70	775.00	\$2,092.50
09/23/2019	PJJ	CA	Conduct research regarding 9th circuit case law regarding section 541.	0.30	395.00	\$118.50
09/23/2019	MPK	CA	Further research judicial estoppel and draft memo re same.	3.80	775.00	\$2,945.00
09/24/2019	PJJ	CA	Conduct research regarding 9th circuit case law regarding section 541.	1.00	395.00	\$395.00
09/24/2019	MPK	CA	Further research and draft memo regarding judicial estoppel.	2.20	775.00	\$1,705.00
11/12/2019	KHB	CA	Confer with Trustee re duties to Debtor.	0.20	975.00	\$195.00
01/12/2020	MPK	CA	Email to creditor requesting pleadings re recovery sharing agreement.	0.20	795.00	\$159.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/16/2020	MPK	CA	Call with creditor regarding notice and status of case (.2); emails to creditors and provide pleadings and information (.2); emails to K. Brown re same (.2)	0.60	795.00	\$477.00
01/22/2020	MPK	CA	Call with creditor regarding status as creditor.	0.10	795.00	\$79.50
01/23/2020	MPK	CA	Review schedules and claims register regarding Sockolow claim (.2)	0.20	795.00	\$159.00
01/23/2020	MPK	CA	Emails to creditor re failure to file claim.	0.30	795.00	\$238.50
01/24/2020	MPK	CA	Email to creditor re proof of claim.	0.10	795.00	\$79.50
01/25/2020	MPK	CA	Review local rules and judge's procedures re hearing date (.3); email to K. Brown re same (.2)	0.50	795.00	\$397.50
02/04/2020	MPK	CA	Email to creditor re special notice.	0.10	795.00	\$79.50
02/10/2020	MPK	CA	Email to creditor regarding outcome of Jan 31 hearing.	0.10	795.00	\$79.50
02/13/2020	MPK	CA	Review recommendation from Court and forward to special counsel.	0.10	795.00	\$79.50
02/21/2020	MPK	CA	Review DC referral order and email to special counsel.	0.10	795.00	\$79.50
09/09/2020	MPK	CA	Emails with K. Brown and creditor regarding status of Sept hearing in Boal litigation.	0.10	795.00	\$79.50
07/22/2021	KHB	CA	Emails with L. Kieve re retention by Fader and impact of sharing agreement (.3).	0.30	1395.00	\$418.50
02/02/2022	MPK	CA	Email status update to creditor, Justin D (.1).	0.10	895.00	\$89.50
06/13/2022	MPK	CA	Email to creditor and K. Brown regarding status of Boal litigation.	0.10	895.00	\$89.50
09/07/2022	KHB	CA	Emails with J. Crom and Trustee re Boel settlement and tax issues.	0.40	1395.00	\$558.00
09/26/2022	KHB	CA	Emails with trustee and M. Manning re Clooback order for tax payments.	0.20	1395.00	\$279.00
09/26/2022	MPK	CA	Review files regarding Clooback motions and email to J. Crom re same (.3); draft motion for authority to pay estate tax obligations, memorandum of P&A, notice and Crom declaration (3.3)	3.60	895.00	\$3,222.00
09/27/2022	MPK	CA	Further work on motion to approve payment of post-petition tax payments, MOPA, Declaration and Notice (1.1); email to J. Crom and K. Brown re same (.1); emails with J. Crom regarding same (.2)	1.40	895.00	\$1,253.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/27/2022	KHB	CA	Emails with J. Crom and M. Manning re obtaining order authorizing tax payment.	0.20	1395.00	\$279.00
09/27/2022	MPK	CA	Draft notice of change of address for main and AP cases (.1); email to K. Brown re same (.1) (No Charge)	0.20	0.00	\$0.00
09/28/2022	MPK	CA	Review changes to Crom declaration and further revise motion, MOPA and notice regarding request to pay administrative taxes.	0.40	895.00	\$358.00
09/28/2022	MPK	CA	Call from creditor Lisa Barry regarding notice issues.	0.10	895.00	\$89.50
10/11/2022	MPK	CA	Further work on motion to approve payment of post-petition taxes and related papers (.4); email to K. Brown re same (.1)	0.50	895.00	\$447.50
10/19/2022	MPK	CA	Review and finalize motion to pay taxes for filing (.5); email to J. Crom regarding supporting declaration (.1); review K. Brown revisions and update Crom declaration (.3); email to J. Crom re updated declaration (.1)	1.00	895.00	\$895.00
10/19/2022	KHB	CA	Work on motion to pay administrative priority taxes (.8); emails with M. Manning and J. Crom re same (.2).	1.00	1395.00	\$1,395.00
10/20/2022	KHB	CA	Confer with Trustee re timing of payment of contingency fee (.4); emails with T. Meade re same (.2); confer with T. Meade re same (.2); emails with J. Crom and trustee re tax implications of timing of payment of contingency fee (.3).	1.10	1395.00	\$1,534.50
10/20/2022	MPK	CA	Review and revise POS for notice for tax motion (.1); revise motion, MOPA re tax payment (.3)	0.40	895.00	\$358.00
10/21/2022	MPK	CA	Review motion to pay administrative taxes and related pleadings and prepare for filing (.9).	0.90	895.00	\$805.50
10/21/2022	KHB	CA	Call with J. Crom and Trustee re minimizing estate's tax liability through timing of deductions (.5); emails with T. Meade, J. Crom and Trustee re same (.2).	0.70	1395.00	\$976.50
10/21/2022	MPK	CA	Review matrix and schedules regarding creditor claim of improper service (.2); email to K. Brown and creditor re same (.2)	0.40	895.00	\$358.00
10/30/2022	MPK	CA	Review email from DSO claimant and email to Trustee re same.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/31/2022	MPK	CA	Review and respond to email from DSO creditor regarding motions, distributions and related matters.	0.20	895.00	\$179.00
11/11/2022	KHB	CA	Emails with L. Kiev and trustee re timing of distributions.	0.30	1395.00	\$418.50
11/14/2022	KHB	CA	Emails with Trustee re timing of distribution (.2); emails with L. Kieve re timing of Fader distribution (.2).	0.40	1395.00	\$558.00
					28.20	\$25,021.00

Claims Admin/Objections[B310]

12/03/2019	KHB	CO	Email to T. Meade re bar date and POC forms.	0.20	975.00	\$195.00
12/06/2019	KHB	CO	Telephone call with Mark Romel counsel for John Gaddy re proof of claim.	0.10	975.00	\$97.50
12/16/2019	KHB	CO	Review Proofs of Claim.	0.40	975.00	\$390.00
12/16/2019	KHB	CO	Emails with Trustee re same.	0.20	975.00	\$195.00
09/15/2020	KHB	CO	Review email from counsel for Boel re withdrawal of claim and emails with T. Meade and Trustee re same.	0.40	995.00	\$398.00
09/16/2020	KHB	CO	Analyze impact of withdrawal of Boel proofs of claim on bankruptcy court's subject matter jurisdiction over adversary proceeding and right to jury trial (.8); emails to T.Meade and Tibor Nagay re same (.5).	1.30	995.00	\$1,293.50
09/17/2020	KHB	CO	Confer with T. Meade and Tibor Nagay and Trustee re Boel request to withdraw proofs of claim (.6); review proofs of claim (.3).	0.90	995.00	\$895.50
09/28/2020	KHB	CO	Review letter from Boal's counsel re withdrawal of claims (.2); analyze authorities on right to jury trial and jurisdiction of bankruptcy court over adversary proceeding claims (2.5); prepare response to letter and emails to special counsel re same (.2).	2.90	995.00	\$2,885.50
09/29/2020	KHB	CO	Respond to Boal's request regarding withdrawal of claims (.5), emails with Trustee and special counsel re same (.3).	0.80	995.00	\$796.00
11/19/2020	KHB	CO	Confer Miriam Manning re conditional opposition to motion to withdraw Boel claims (.2); emails to M. Manning re same (.2); review motion (.2).	0.60	995.00	\$597.00
11/20/2020	KHB	CO	Review motion to withdraw claim.	0.50	995.00	\$497.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/20/2020	KHB	CO	Email to T. Meade re response to Boel motion to withdraw claims (.3); email to assistant re response dates (.1).	0.40	995.00	\$398.00
11/23/2020	MPK	CO	Review motion to withdraw claim and review treatise re same. (No Charge)	0.60	0.00	\$0.00
11/24/2020	KHB	CO	Emails with Tibor Nagay re Boel motion to withdraw claims (.2); emails with Trustee re same (.1).	0.30	995.00	\$298.50
11/29/2020	KHB	CO	Emails with T. Nagay and Trustee re motion to withdraw claims.	0.20	995.00	\$199.00
11/30/2020	KHB	CO	Confer with T. Meade and T. Nagay re response to Boel motion to withdraw claims (.5); confer with M. Manning re same (.2); review motion and authorities re response to motion (.4); email to Boel's counsel re withdrawal with prejudice (.2).	1.30	995.00	\$1,293.50
11/30/2020	MPK	CO	Review files in preparation of conference call with special counsel (.2); Call with special counsel and K. Brown regarding status of litigation and withdrawal of claim (.5); review case law regarding withdrawal of claims (.9); call with K. Brown regarding dismissal issues (.1). (No Charge)	1.70	0.00	\$0.00
12/01/2020	MPK	CO	Research legal issues relating to withdrawal of claims (1.2); email to K. Brown re same (.2). (No Charge)	1.40	0.00	\$0.00
12/01/2020	KHB	CO	Confer with B. Dooley and P. Benvenuti re withdrawal of Boel claim with prejudice and impact on jury trial rights (.3); emails with T. Meade and Trustee re same (.3).	0.60	995.00	\$597.00
12/02/2020	MPK	CO	Review emails regarding Boal's withdrawal of proof of claim.	0.10	795.00	\$79.50
12/02/2020	KHB	CO	Emails with T. Nagay and Trustee re withdrawal of Boel claim with prejudice.	0.20	995.00	\$199.00
12/03/2020	KHB	CO	Review revisions to stipulation to withdraw claims and emails with special counsel re same (.2); revise stipulation (.7).	0.90	995.00	\$895.50
12/07/2020	KHB	CO	Review and respond to emails from B. Dooley re stipulation for withdrawal of claims (.2); emails with T. Meade re same (.2); confer with M. Manning re limited objection to motion to withdraw to condition on withdrawal with prejudice and authorities to support; (.3); emails with special counsel re same	1.00	995.00	\$995.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			(.3).			
12/07/2020	MPK	CO	Call with K. Brown regarding response to Boal's motion to withdraw claim (.1); review emails with Boal counsel re same (.1); second call with K. Brown regarding withdrawal of Boal claim (.1); research basis for objection to motion (1.8); draft limited opposition to motion to withdraw claim (.7). (No Charge)	2.80	0.00	\$0.00
12/08/2020	MPK	CO	Research discreet issues involving claim withdrawal (1.3); emails to special counsel regarding claim withdrawal issues (.3) further edit limited opposition to motion to withdraw claims (.2); email to Boal counsel regarding stipulation re claim withdrawal (.1); review final version of stipulation re dismissal of motion to withdraw (.1) (No Charge)	2.00	0.00	\$0.00
12/10/2020	MPK	CO	Emails to co-counsel regarding stipulation to withdraw claims.	0.10	795.00	\$79.50
03/30/2021	KHB	CO	Confer with Tibor Nagay re treatment of late filed claims (.2); emails re same (.1).	0.30	1225.00	\$367.50
03/31/2021	KHB	CO	Confer with potential claimant re filing claim after bar date.	0.30	1225.00	\$367.50
08/17/2022	MPK	CO	Review DSO claims and email to litigation team and K. Brown re same (.5); review petition and claims register (.3); research on treatment of DSO claims under the Code and draft email to K. Brown re same (1.4)	2.20	895.00	\$1,969.00
08/18/2022	KHB	CO	Email from M. Manning re treatment of post – petition domestic support obligations.	0.20	1395.00	\$279.00
08/18/2022	MPK	CO	Research post-petition interest on DSO claims.	0.40	895.00	\$358.00
09/13/2022	KHB	CO	Analysis of domestic support claims and basis to object to post-petition portions of claims (.5); emails to claimants re withdrawal of portions of claims based on same (1.2).	1.70	1395.00	\$2,371.50
09/13/2022	MPK	CO	Review DSO claims and research interest claims and related matters (1.4); draft emails to DSO claimants re resolution efforts (1.5); email to litigation counsel regarding waterfall (.2)	3.10	895.00	\$2,774.50
09/14/2022	KHB	CO	Work on DSO claims objections.	0.20	1395.00	\$279.00
09/14/2022	MPK	CO	Call with holder of Claim No. 23 re claim amount (.1); email to claimant re need amend (.3); emails to K. Brown re same (.2); email to Trustee re claim	2.50	895.00	\$2,237.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			resolutions (.1); review amended claim No. 23 and email to team (.2); email to team regarding potential DSO claims, review same (.6)			
09/15/2022	KHB	CO	Emails from DSO claimant and M. Manning re reduction of DSO claims.	0.40	1395.00	\$558.00
09/15/2022	MPK	CO	Call with Lisa Barry re claim reconciliation (.4); emails with Lisa Barry re claim calculations (.5); draft notice of withdrawal of claim No. 6 and forward to Lisa Barry (.9)	1.80	895.00	\$1,611.00
09/17/2022	MPK	CO	Email with Lisa Barry regarding notice of withdrawal.	0.10	895.00	\$89.50
09/21/2022	MPK	CO	Emails to Lisa Barry regarding Claim No. 6.	0.10	895.00	\$89.50
10/11/2022	MPK	CO	Call with Napa County regarding duplicative claims (.2); review claims and draft email to Napa County re withdrawal of duplicate claim (.8); draft notice of withdrawal of claim (.2)	1.20	895.00	\$1,074.00
10/13/2022	KHB	CO	Work on email to DSO claimants re withdrawal of duplicate claims.	0.20	1395.00	\$279.00
10/17/2022	MPK	CO	Email to NAPA County re withdrawal of claim.	0.10	895.00	\$89.50
10/20/2022	KHB	CO	Confer with Trustee re-claims objections and initial review of claims (.2); emails with counsel for Fader and J. Crom re amount of general unsecured claims (.3) ; confer with M. Manning re status of claims review (.2).	0.70	1395.00	\$976.50
10/20/2022	MPK	CO	Call with Amy Edelen regarding Claim No. 13 (.2); emails to claimant and forward updated withdrawal form (.2); revise notice of withdrawal for claim no. 13 (.1); review files re status of withdrawal of Claim no. 6 (.1); draft notes to file re status of dso claims (.3); email to Trustee regarding DSO claims (.3)	1.20	895.00	\$1,074.00
10/21/2022	MPK	CO	Email to Napa County DCSS re withdrawal of claim (.1); email to Loren Keive re same (.1)	0.20	895.00	\$179.00
				38.80		\$30,298.50

Review Fee App of Other Prof.

09/01/2022	KHB	CP03	Emails with Trustee re fee applications for professionals.	0.20	1395.00	\$279.00
09/20/2022	MPK	CP03	Review and assist preparation of lit counsel fee application.	0.40	895.00	\$358.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/22/2022	MPK	CP03	Review contingency fee applications and revise application for special counsel (.3); email to T. Meade regarding procedure for compensation (.1)	0.40	895.00	\$358.00
09/22/2022	LAF	CP03	Legal research re: Contingency fee app. (No Charge)	0.80	0.00	\$0.00
09/24/2022	MPK	CP03	Research legal authority for contingency fee application and draft same for fee application. (No Charge)	0.90	0.00	\$0.00
09/26/2022	MPK	CP03	Further work on fee application for special counsel (.4); email to special counsel regarding fee application (.2)	0.60	895.00	\$537.00
10/19/2022	KHB	CP03	Emails with T. Meade re Fee Application.	0.20	1395.00	\$279.00
10/21/2022	MPK	CP03	Email to T. Meade regarding status of fee application.	0.10	895.00	\$89.50
10/21/2022	KHB	CP03	Confer with T. Meade re circumstances under which disgorgement would be required (.2); emails T. Meade re timing of payments of contingency fee (.2).	0.40	1395.00	\$558.00
10/24/2022	MPK	CP03	Draft notice of special counsel's fee application (.6); email to special counsel re same (.1)	0.70	895.00	\$626.50
10/25/2022	MPK	CP03	Emails with T. Meade regarding filing fee application (.3); review expense reimbursement requests and review guidelines (.1); review application and exhibits (.2)	0.60	895.00	\$537.00
				5.30	\$3,622.00	

Employment of Professionals

09/17/2019	KHB	EMP	Work on employment application and declaration.	0.50	975.00	\$487.50
09/24/2019	MPK	EMP	Review docket re status of employment app and claim deadline; email re same. (No Charge)	0.10	0.00	\$0.00
09/26/2019	LAF	EMP	Legal research re: Employing special litigation counsel on a contingency basis.	0.30	425.00	\$127.50
09/27/2019	MPK	EMP	Prepare employment application, declaration and order for Meade Firm and Dontzin as special litigation counsel on contingency fee basis.	2.20	775.00	\$1,705.00
09/27/2019	KHB	EMP	Work on application to employ special counsel to prosecute Bool claims.	0.50	975.00	\$487.50
09/30/2019	MPK	EMP	Further revise application to include both special	1.00	775.00	\$775.00

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			counsel; revise declarations of T. Meade and Tibor Nagy (.8); draft email to counsel re same (.2)			
10/02/2019	KHB	EMP	Review special counsel engagement agreements; email to Trustee re same.	0.40	975.00	\$390.00
10/03/2019	MPK	EMP	Revise retainer agreement (.2); revise application based on retainer agreement (.6); emails with K. Brown re same (.1)	0.90	775.00	\$697.50
10/03/2019	KHB	EMP	Work on employment agreement with special counsel.	1.80	975.00	\$1,755.00
10/03/2019	KHB	EMP	Confer with Trustee re employment agreement.	0.10	975.00	\$97.50
10/03/2019	KHB	EMP	Work on employment application for special counsel.	1.00	975.00	\$975.00
10/04/2019	MPK	EMP	Emails to K. Brown regarding expense reimbursement for special counsel (.2); review guidelines (.1); further work on declarations of both special counsel (.6)	0.90	775.00	\$697.50
10/04/2019	KHB	EMP	Call with proposed special counsel and Trustee.	0.30	975.00	\$292.50
10/04/2019	KHB	EMP	Revise special counsel retention agreement.	0.50	975.00	\$487.50
10/04/2019	KHB	EMP	Telephone calls with Trustee re same.	0.20	975.00	\$195.00
10/07/2019	MPK	EMP	Emails with K. Brown regarding contingency fee calculation (.1); further work on employment applications/declarations and order (.3)	0.40	775.00	\$310.00
10/07/2019	KHB	EMP	Work on contingency fee employment application.	1.80	975.00	\$1,755.00
10/08/2019	KHB	EMP	Confer with T. Meade re employment application and fee agreement.	0.20	975.00	\$195.00
10/08/2019	KHB	EMP	Email to Trustee re T. Meade employment application and fee agreement.	0.10	975.00	\$97.50
10/10/2019	KHB	EMP	Call with T. Meade re conflict issues.	0.40	975.00	\$390.00
10/10/2019	KHB	EMP	Email Trustee re conflict issues.	0.10	975.00	\$97.50
10/10/2019	KHB	EMP	Review contingency fee agreement and email trustee re same.	0.30	975.00	\$292.50
10/10/2019	KHB	EMP	Call with Trustee re retention of contingency fee counsel.	0.10	975.00	\$97.50
10/10/2019	KHB	EMP	Emails to T. Meade re Trustee's comments.	0.10	975.00	\$97.50
10/12/2019	KHB	EMP	Confer with T. Meade re retention.	0.30	975.00	\$292.50

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					<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/12/2019	KHB	EMP	Emails with Trustee re retention of contingency fee counsel.		0.30	975.00	\$292.50
10/15/2019	KHB	EMP	Confer with Trustee re retention of contingency fee counsel.		0.10	975.00	\$97.50
10/16/2019	KHB	EMP	Telephone calls with T. Meade re retention and conflict issues.		0.20	975.00	\$195.00
10/16/2019	KHB	EMP	Confer with Trustee re retention and conflict issues.		0.20	975.00	\$195.00
10/21/2019	KHB	EMP	Emails with T. Meade re retention and conflict waiver.		0.10	975.00	\$97.50
10/22/2019	KHB	EMP	Review Meade letter to Debtor re conflict waiver.		0.10	975.00	\$97.50
10/22/2019	KHB	EMP	Telephone call with T. Meade re same and next steps.		0.20	975.00	\$195.00
10/24/2019	MPK	EMP	Review revised employment pleadings from special counsel.		0.30	775.00	\$232.50
10/24/2019	KHB	EMP	Work on employment applications for contingency fee counsel.		0.50	975.00	\$487.50
10/24/2019	KHB	EMP	Emails with Marc Levinson re employment applications; telephone call with Marc Levinson re same.		0.30	975.00	\$292.50
10/25/2019	KHB	EMP	Work on application of contingency fee counsel.		0.70	975.00	\$682.50
11/01/2019	MPK	EMP	Emails with K. Brown regarding employment of special counsel (.1); review and further revise employment pleadings and prepare for service (.6)		0.70	775.00	\$542.50
11/01/2019	KHB	EMP	Work on employment application for contingency fee counsel.		0.20	975.00	\$195.00
11/03/2019	MPK	EMP	Email to Trustee regarding special counsel employment (.2); email to Tibor Nagy regarding declaration (.1); email to Meade office re decl. (.1)		0.40	775.00	\$310.00
11/05/2019	KHB	EMP	Finalize employment application for contingency fee counsel and retention agreements.		0.20	975.00	\$195.00
11/05/2019	KHB	EMP	Emails with T. Meade re employment re application for contingency fee counsel and retention agreements.		0.10	975.00	\$97.50
11/06/2019	KHB	EMP	Work on finalizing retention agreements with contingency fee counsel.		0.20	975.00	\$195.00
11/06/2019	MPK	EMP	Revise order approving the employment of special		0.20	775.00	\$155.00

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			counsel.			
12/15/2020	MPK	EMP	Review Guidelines and files regarding notices re fees.	0.20	795.00	\$159.00
				19.70		\$17,509.00

Litigation Sharing Agreement

10/08/2019	KHB	LSA	Email to Marc Levinson re Fader/Boal litigation.	0.10	975.00	\$97.50
10/24/2019	KHB	LSA	Emails and telephone call with Marc Levinson re Boel litigation and Fader's role.	0.30	975.00	\$292.50
10/30/2019	KHB	LSA	Emails with Trustee and Mari Levinson re meeting to discuss Debtor's participation in litigation.	0.20	975.00	\$195.00
11/11/2019	KHB	LSA	Meet with Marc Levinson and Trustee re Debtor's participation in Boels' Litigation.	1.00	975.00	\$975.00
11/11/2019	KHB	LSA	Confer with Trustee re Debtor's participation in Boels' Litigation.	0.20	975.00	\$195.00
11/12/2019	KHB	LSA	Emails with Marc Levinson re Debtors participation in litigation recovery analyze re Trustee's duties to Debtor.	0.30	975.00	\$292.50
11/12/2019	KHB	LSA	Confer with Trustee re Debtors participation in litigation recovery analyze re Trustee's duties to Debtor.	0.20	975.00	\$195.00
11/12/2019	KHB	LSA	Confer with T. Meade and Trustee re Boels litigation and split with Debtor.	0.50	975.00	\$487.50
11/12/2019	MPK	LSA	Draft litigation recovery agreement.	0.40	775.00	\$310.00
11/14/2019	MPK	LSA	Further work on litigation recovery sharing agreement.	1.90	775.00	\$1,472.50
11/18/2019	KHB	LSA	Work on motion to approve sharing of litigation recovery with Fader.	0.20	975.00	\$195.00
11/20/2019	KHB	LSA	Work on sharing agreement with Debtor.	0.80	975.00	\$780.00
11/21/2019	KHB	LSA	Emails with Marc Cohen re Fader agreement.	0.10	975.00	\$97.50
11/25/2019	MPK	LSA	Emails with K. Brown re agreement with debtor to share recovery (.1); work on motion to approve agreement (.6); revise sharing agreement to include waiver (.1)	0.80	775.00	\$620.00
11/25/2019	KHB	LSA	Emails with M. Levinson re sharing agreement.	0.20	975.00	\$195.00

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11/26/2019	KHB	LSA	Work on litigation recovery sharing agreement and motion to approve.	1.50	975.00	\$1,462.50
11/27/2019	MPK	LSA	Emails with K. Brown regarding motion to approve sharing agreement and agreement (.2); review revisions to both documents (.2); review emails regarding agreement with debtor (.1)	0.50	775.00	\$387.50
12/12/2019	KHB	LSA	Confer with Marc Levinson re split of litigation proceeds with Debtor.	0.30	975.00	\$292.50
12/12/2019	KHB	LSA	Emails with Marc Levinson re split of litigation proceeds with Debtor.	0.10	975.00	\$97.50
12/12/2019	KHB	LSA	Emails with L. Schoenmann re split of litigation proceeds with Debtor.	0.10	975.00	\$97.50
12/12/2019	KHB	LSA	Work on agreement with Fader split of Boel Litigation proceeds.	0.50	975.00	\$487.50
12/13/2019	MPK	LSA	Draft motion, memorandum of points and authorities in support of sharing agreement and notice.	3.10	775.00	\$2,402.50
12/16/2019	KHB	LSA	Work on sharing agreement.	0.30	975.00	\$292.50
12/16/2019	KHB	LSA	Work on motion to approve sharing agreement.	1.00	975.00	\$975.00
12/16/2019	MPK	LSA	O/c with K. Brown regarding Fader compromise (.3); emails with K. Brown regarding Fader compromise (.4); review case law re compromise issues (1); draft declaration for Trustee in support of compromise motion (.6); revise compromise motion (.3)	2.60	775.00	\$2,015.00
12/17/2019	MPK	LSA	Further work on Trustee's declaration in support of sharing agreement.	0.50	775.00	\$387.50
12/18/2019	MPK	LSA	Call from K. Brown regarding changes to memorandum of compromise (.1); further revise memorandum and review supporting papers (1.4)	1.50	775.00	\$1,162.50
12/19/2019	KHB	LSA	Work on motion to approving litigation recovery sharing agreement.	0.30	975.00	\$292.50
12/19/2019	MPK	LSA	Review signed declaration and email to special counsel re same.	0.10	775.00	\$77.50
12/23/2019	MPK	LSA	Review claims register and certain claims (.4); revise motion to reference claim amounts and nature (.4)	0.80	775.00	\$620.00
12/27/2019	KHB	LSA	Review emails from Marc Levinson and proposed	0.30	975.00	\$292.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			revisions to litigation recovery sharing agreement.			
12/27/2019	KHB	LSA	Respond to emails.	0.40	975.00	\$390.00
12/27/2019	KHB	LSA	Work on motion to approve sharing agreement and revisions to agreement.	0.60	975.00	\$585.00
12/29/2019	KHB	LSA	Emails with Trustee re Litigation recovery sharing agreement.	0.20	975.00	\$195.00
12/29/2019	KHB	LSA	Work on agreement and revisions by Fader.	0.40	975.00	\$390.00
12/30/2019	MPK	LSA	Update all pleadings to conform to suggested edits by Debtor's counsel (.2); email to debtor's counsel re same (.1)	0.30	775.00	\$232.50
01/06/2020	MPK	LSA	Email to Trustee regarding sharing agreement motion.	0.10	795.00	\$79.50
01/07/2020	KHB	LSA	Work on notice of motion and motion to approve litigation recovery sharing agreement.	0.60	995.00	\$597.00
01/07/2020	MPK	LSA	Email to T. Meade regarding declaration in support of sharing agreement (.1); review all pleadings and prepare for filing (.3); revise notice (.5)	0.90	795.00	\$715.50
01/10/2020	MPK	LSA	Return calls to two creditors regarding sharing motion.	0.10	795.00	\$79.50
01/25/2020	MPK	LSA	Review Boal's opposition brief.	0.60	795.00	\$477.00
01/26/2020	MPK	LSA	Emails regarding local rules and objection to sharing agreement (.4); review res judicata issues and deference issues (.8)	1.20	795.00	\$954.00
01/27/2020	KHB	LSA	Review objection to sharing agreement and prepare for call with T. Meade re reply.	0.50	995.00	\$497.50
01/27/2020	KHB	LSA	Emails with T. Meade re reply.	0.50	995.00	\$497.50
01/27/2020	KHB	LSA	Work on reply to opposition to sharing agreement.	1.50	995.00	\$1,492.50
01/27/2020	KHB	LSA	Emails with M. Manning re reply research.	0.30	995.00	\$298.50
01/27/2020	MPK	LSA	Conference call with special counsel, K. Brown and Debtor's counsel re sharing agreement (.7); draft insert to reply brief (2.2); draft emails to counsel re same (.2)	3.10	795.00	\$2,464.50
01/28/2020	MPK	LSA	Emails with special counsel re reply brief (.4); review case proposed by special counsel and email to K. Brown re same (.5)	0.90	795.00	\$715.50
01/28/2020	KHB	LSA	Emails with T. Meade re reply brief to objection to	0.70	995.00	\$696.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			approval of sharing agreement.			
01/29/2020	KHB	LSA	Confer with M. Manning re sharing agreement.	0.40	995.00	\$398.00
01/29/2020	KHB	LSA	Work on reply to objection to Fader sharing agreement.	3.50	995.00	\$3,482.50
01/29/2020	MPK	LSA	Revise reply brief (2.4); call with T. Meade re case (.2); calls with K. Brown re same (.3); call with Annie B re same (.1); review and respond to various emails regarding the reply (.6); review additional revisions and provide more comments of my own (1.2)	4.80	795.00	\$3,816.00
01/30/2020	KHB	LSA	Work on reply brief to opposition to motion to approve sharing agreement.	2.50	995.00	\$2,487.50
01/30/2020	MPK	LSA	Revise Request for Judicial Notice (.2); review reply and emails to special counsel and K. Brown re same (.9); call with Annie B. re filing (.1)	1.20	795.00	\$954.00
01/30/2020	KHB	LSA	Prepare for hearing on approval of sharing agreement.	1.50	995.00	\$1,492.50
01/31/2020	MPK	LSA	Call with K. Brown re service issues (.1); review service lists and email to K. Brown re same (.1); draft order (.4)	0.60	795.00	\$477.00
01/31/2020	KHB	LSA	Attend hearing on motion to approve sharing agreement.	2.00	995.00	\$1,990.00
02/04/2020	KHB	LSA	Emails with Marc Levinson re same.	0.10	995.00	\$99.50
02/04/2020	KHB	LSA	Email to counsel re Boel re order on approval of sharing agreement.	0.10	995.00	\$99.50
				50.30		\$44,396.50

Mediation

08/01/2022	KHB	ME	Emails from T. Nagay re mediation issues and briefing.	0.20	1395.00	\$279.00
08/05/2022	KHB	ME	Emails from T. Meade and Trustee re mediation issues.	0.20	1395.00	\$279.00
08/10/2022	KHB	ME	Review draft mediation brief.	1.00	1395.00	\$1,395.00
08/11/2022	KHB	ME	Call re mediation strategy with T. Meade, T. Nagay and Trustee (.5); confer with Trustee re mediation strategy (.2); emails with T. Meade re same (.2).	0.90	1395.00	\$1,255.50
08/16/2022	KHB	ME	Work on mediation brief.	1.50	1395.00	\$2,092.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/17/2022	KHB	ME	Confer with T. Meade re mediation strategy (.2); confer with Trustee re mediation strategy (.2); emails to T. Meade and Trustee re revisions to letter to mediator and review claims and claims docket re same (1.5); call with T. Meade and M. Manning re letter to mediator and impact of domestic support claims (.5); emails from Trustee re mediation letter and strategy (.1).	2.50	1395.00	\$3,487.50
08/17/2022	MPK	ME	Call with litigation team and K. Brown regarding settlement and waterfall.	0.40	895.00	\$358.00
08/19/2022	KHB	ME	Emails with T. Nagay and Trustee re call on mediation strategy.	0.20	1395.00	\$279.00
08/22/2022	KHB	ME	Work on draft settlement agreement and email with T. Meade re same (.5); email T. Meade re K. Brown deposition (.2).	0.70	1395.00	\$976.50
08/23/2022	KHB	ME	Call with Trustee and T. Nagay re mediation prep (.5); review Boel mediation statement and exhibits (1.4).	1.90	1395.00	\$2,650.50
08/24/2022	KHB	ME	Prepare for mediation and email to Trustee re same (.3); attend mediation (7.0).	7.30	1395.00	\$10,183.50
08/25/2022	KHB	ME	Review mediator proposal and email to mediator re clarification (.2); emails with T. Nagay, T. Meade and Trustee re response to mediator proposal (.3); emails with T. Meade re proper scope of communications with Fader's counsel re mediation (.2).	0.70	1395.00	\$976.50
08/31/2022	KHB	ME	Email from Mediator re acceptance of Mediator's proposal.	0.10	1395.00	\$139.50
08/31/2022	KHB	ME	Emails to Trustee re acceptance of Mediator's proposal.	0.10	1395.00	\$139.50
08/31/2022	KHB	ME	Emails from T. Meade re acceptance of Mediator's proposal.	0.10	1395.00	\$139.50
08/31/2022	KHB	ME	Conference M. Manning re preparation of Rule 9019 motion.	0.10	1395.00	\$139.50
09/01/2022	KHB	ME	Emails with T. Meade, Brook Dooley and Matt Kaplan re settlement agreement and Rule 9109 motion (.4); emails with M. Manning re "waterfall" analysis (.2).	0.60	1395.00	\$837.00
09/01/2022	MPK	ME	Review and respond to emails with K. Brown and litigation counsel regarding settlement of Boal	3.70	895.00	\$3,311.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			litigation (.4); draft motion to compromise controversy (1.3); revise waterfall based on new settlement figure (1.6); review claims register (.2); review settlement and email to litigation counsel re proposed language (.2)			
09/02/2022	KHB	ME	Work on settlement agreement.	1.00	1395.00	\$1,395.00
09/02/2022	KHB	ME	Emails with M. Manning re Rule 9019 motion and waterfall analysis (.3); confer with M. Manning re same (.2); emails with Trustee re same (.2); confer with T. Meade and M. Manning re settlement agreement, motion to approve and fee applications (.3).	1.00	1395.00	\$1,395.00
09/02/2022	MPK	ME	Review register, emails and draft revised waterfalls and email to team (2.2); further work on motion to compromise (.8); call with K. Brown re revised waterfall (.1); conference call with T. Meade and K. Brown regarding settlement of adversary proceeding (.3); draft memorandum of points and authorities in support of motion to compromise adversary proceeding (.4)	3.80	895.00	\$3,401.00
09/05/2022	MPK	ME	Review emails by J. Crom, Trustee and K. Brown and email regarding settlement calculations (1.2); review and revise the settlement agreement and email to litigation counsel re same (.9); draft memorandum of P&As re Boal settlement (1.7)	3.80	895.00	\$3,401.00
09/06/2022	KHB	ME	Emails with J. Crom re tax implications of settlement (.1); emails with Trustee re settlement with Boel (.1); emails with M. Manning re same (.1); review and revise draft settlement agreement (.2); emails from T. Meade to B. Dooley re settlement agreement (.1).	0.60	1395.00	\$837.00
09/06/2022	MPK	ME	Draft Trustee's declaration in support of compromise motion and notice of hearing (1.8); review Court's procedures for updated notice information (.2); review and respond to emails regarding settlement issues (.3)	2.30	895.00	\$2,058.50
09/08/2022	KHB	ME	Emails with J. Crom and Trustee re Boal settlement (.2); work on motion to approve Boal settlement (.8).	1.00	1395.00	\$1,395.00
09/09/2022	KHB	ME	Work on motion to approve Boal Settlement (2.5); emails with J. Crom, T. Meade and Trustee re distribution waterfall (.4).	2.90	1395.00	\$4,045.50
09/09/2022	MPK	ME	Review revisions to memorandum by K. Brown and further revise same (1.9); email to K. Brown	2.20	895.00	\$1,969.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			regarding potential objectionable claims (.3)			
09/12/2022	KHB	ME	Confer with T. Meade and trustee re Boal settlement, tax issues and claim objections (.4); work on motion to approve Boal settlement (.5); confer with M. Manning re settlement motion and claim objections (.3).	1.20	1395.00	\$1,674.00
09/12/2022	MPK	ME	Revise memorandum of points and authorities in support of compromise (1.7); call with K. Brown re same (.2)	1.90	895.00	\$1,700.50
09/13/2022	KHB	ME	Emails from B. Dooley and T. Meade re settlement agreement.	0.20	1395.00	\$279.00
09/14/2022	KHB	ME	Work on email to Fader's counsel re settlement and waterfall analysis (.7); emails from M. Kaplan the T. Meade re Quotient request for delayed settlement payment (.2); emails with Trustee re same (.1).	1.00	1395.00	\$1,395.00
09/14/2022	MPK	ME	Call with T. Meade regarding settlement motion.	0.20	895.00	\$179.00
09/15/2022	KHB	ME	Confer with T. Meade re Quotient request to delay settlement payment (.2); emails with T. Meade and Trustee re same (.3).	0.50	1395.00	\$697.50
09/15/2022	MPK	ME	Review revisions by T. Meade to memorandum and further revise same (.5); review settlement agreement (.2); review emails re settlement issues (.2)	0.90	895.00	\$805.50
09/16/2022	KHB	ME	Confer with T. Meade, Trustee and J. Crom re Quotient request to delay settlement payment and impact on estate (.4); emails with M. Manning re motion to approve settlement (.2).	0.60	1395.00	\$837.00
09/19/2022	KHB	ME	Work on motion to approve settlement.	0.80	1395.00	\$1,116.00
09/19/2022	MPK	ME	Review K. Brown comments to memorandum and further revise same.	0.40	895.00	\$358.00
09/20/2022	MPK	ME	Review emails re settlement.	0.10	895.00	\$89.50
09/21/2022	KHB	ME	Emails from T. Meade re negotiations with Boal over payment terms (.2); email from Trustee re same (.1); confer with T. Meade re same (.2); work on revisions to settlement agreement (.2).	0.70	1395.00	\$976.50
09/21/2022	MPK	ME	Review emails from Trustee and special counsel regarding settlement agreement; email to same regarding settlement terms.	0.40	895.00	\$358.00
09/22/2022	MPK	ME	Emails to K. Brown regarding proposed timing for	0.30	895.00	\$268.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			settlement (.1); review Judge Montali's calendaring system (.1); email to K. Brown re same (.1)			
09/23/2022	KHB	ME	Emails with T. Meade, J. Crom and Trustee re impact of modifications to draft settlement agreement and payments over time.	0.40	1395.00	\$558.00
09/24/2022	MPK	ME	Review settlement and email regarding release language (.2); emails to K. Brown re same (.2)	0.40	895.00	\$358.00
09/28/2022	KHB	ME	Emails with M. Manning re motion to approve Boal settlement.	0.20	1395.00	\$279.00
09/28/2022	MPK	ME	Email to K. Brown, Trustee and T. Meade regarding timing of settlement motion.	0.10	895.00	\$89.50
10/05/2022	KHB	ME	Emails with Fader's counsel re settlement.	0.40	1395.00	\$558.00
10/05/2022	MPK	ME	Review and respond to email regarding waterfall/domestic support claims.	0.20	895.00	\$179.00
10/06/2022	KHB	ME	Call with trustee and T. Meade re settlement (.4); call with T. Meade, and counsel for Boal and Quotient re modifications to settlement (.5); work on settlement agreement (.3); calls with T. Meade and Trustee re same (.2).	1.40	1395.00	\$1,953.00
10/08/2022	MPK	ME	Review K. Brown comments to memorandum and further revise same.	1.00	895.00	\$895.00
10/10/2022	KHB	ME	Telephone call with T. Meade and trustee re Boal revisions to settlement agreement (.5); review proposed revisions and prepare for call with trustee and T. Meade (.3); emails from M. Manning and T. Meade re trustee revisions to settlement agreement (.2).	1.00	1395.00	\$1,395.00
10/10/2022	MPK	ME	Conference call with Lynn S, K. Brown and T. Meade regarding revisions to agreement and settlement matters (.5); review further revised agreement and email to T. Meade re same (.3)	0.80	895.00	\$716.00
10/11/2022	KHB	ME	Work on settlement agreement and emails with Trustee and T. Meade re same (1.5); email from court re Rule 9019 motion (.1).	1.60	1395.00	\$2,232.00
10/11/2022	MPK	ME	Email to Judge's chambers regarding Rule 9019 motion (.1); revise Trustee's declarations in support of Rule 9019 motion (1); call with K. Brown regarding court inquiry (.1)	1.20	895.00	\$1,074.00
10/12/2022	KHB	ME	Work on revisions to settlement agreement and emails to T. Meade re same (2.4); call with T. Meade	3.70	1395.00	\$5,161.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			re same (.3); work on motion to approve settlement (.5); emails from Boal counsel re revisions to settlement agreement (.2); emails with M. Manning re Rule 9019 motion and revisions to settlement agreement (.3).			
10/12/2022	MPK	ME	Further revise Trustee's declaration in support of settlement (.4); emails with J. Crom re distributions (.2); call with K. Brown re settlement motion (.1); emails with K. Brown and T. Meade regarding settlement terms (.8); revise notice of motion (.5)	2.00	895.00	\$1,790.00
10/13/2022	KHB	ME	Work on revisions to settlement agreement (1.5); emails with T. Meade and Trustee re revisions to settlement agreement (.6); emails with T. Meade and J. Crom re waterfall analysis (.2); work on motion to approve settlement (.5).	2.80	1395.00	\$3,906.00
10/13/2022	MPK	ME	Call with T. Meade regarding settlement filing procedures and related matters (.2); review recent revisions to settlement and email to T. Meade and K. Brown re same (.8); revise notice and Trustee's declaration (3.1); review service list for notice (.1); draft T. Meade declaration in support of settlement and update MOPA (1.7)	5.90	895.00	\$5,280.50
10/14/2022	KHB	ME	Work on settlement agreement (1.3); work on settlement motion (.5); emails from M. Kaplan and T. Meade re settlement agreement (.2); confer with T. Meade and M. Manning re obtaining special hearing date within notice period (.2); confer with T. Meade re same (.1).	2.30	1395.00	\$3,208.50
10/14/2022	MPK	ME	Call with K. Brown and T. Meade regarding settlement motion and related issues (.2); emails to T. Meade and K. Brown re same (.6); review and revise POS for motion (.1)	0.90	895.00	\$805.50
10/17/2022	KHB	ME	Emails with T. Meade and M. Manning re finalization of settlement agreement and motion for approval (.3); confer with M. Manning re same (.1).	0.40	1395.00	\$558.00
10/17/2022	MPK	ME	Review edits to Meade declaration and further revise MOPA and related pleadings (1.1); emails with T. Meade regarding declaration (.4); review exhibits for T. Meade declaration (.3); email to Trustee re status of settlement (.1)	1.90	895.00	\$1,700.50
10/18/2022	KHB	ME	Emails with T. Meade and M. Manning re motion to approve settlement.	0.50	1395.00	\$697.50
10/18/2022	MPK	ME	Revise Trustee's declaration (.1); email to K. Brown	0.60	895.00	\$537.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			and T. Meade re same and related matters (.3); email to Trustee re revised declaration (.1); update POS (.1)			
10/19/2022	KHB	ME	Emails with M. Manning re errata to motion to approve Boal settlement.	0.20	1395.00	\$279.00
10/19/2022	MPK	ME	Email with T. Meade regarding settlement motion (.1); review and prepare all pleadings for filing (.5); review email from J. Crom re distributions to estate and email to K. Brown re same (.1); draft amended notice of hearing (.1)	0.80	895.00	\$716.00
10/20/2022	KHB	ME	Work on errata notice (.3); emails with counsel for Quotient and Boal re same (.2). (No Charge)	0.50	0.00	\$0.00
10/20/2022	MPK	ME	Call with K. Brown regarding need to clarify settlement terms (.2); draft Amended Notice and Errata (1.2); second call with K. Brown re amended notice and claims (.2); revise Notice and Errata and email to defendants (.3) (No Charge)	1.90	0.00	\$0.00
10/21/2022	MPK	ME	Further revise amended notice/errata (.1). (No Charge)	0.10	0.00	\$0.00
10/21/2022	MPK	ME	Email to K. Brown regarding further changes to amended notice (.1). (No Charge)	0.10	0.00	\$0.00
10/21/2022	KHB	ME	Emails with creditor J. Codder re motion to approve settlement.	0.20	1395.00	\$279.00
10/27/2022	KHB	ME	Email from L. Kiev objecting to Boal settlement (.2); emails with T. Meade and L. Schoenmann re suggested response to Kiev letter (.4); review and respond to email from creditor seeking extension to respond to motion to approve settlement (.3).	0.90	1395.00	\$1,255.50
10/27/2022	MPK	ME	Review email from creditor re matters set for Nov hearing and draft response.	0.30	895.00	\$268.50
10/28/2022	KHB	ME	Emails with T. Meade and Lynn Schoenmann re Fader objection to settlement	0.20	1395.00	\$279.00
10/28/2022	MPK	ME	Review service of employment application and email to K. Brown regarding objections to settlement.	0.10	895.00	\$89.50
10/31/2022	KHB	ME	Email from creditor re continuance of motion to approve Boal settlement	0.10	1395.00	\$139.50
11/01/2022	KHB	ME	Emails with T. Meade re Fader letter objecting to settlement and claiming ownership of claims based on post-petition breach of pre-petition oral	1.20	1395.00	\$1,674.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			agreements (.6); review authorities and Litigation Sharing agreement re same (.4); confer with Trustee re same (.2).			
11/02/2022	KHB	ME	Emails with L. Kiev and trustee re Fader's objections to Boal settlement and contingency fee and claim to ownership of claims that are property of estate (.6); call with trustee and L. Kiev re same (.4).	1.00	1395.00	\$1,395.00
11/03/2022	KHB	ME	Confer with L. Kiev re Fader objections to Boal settlement (.2); email to L Kiev re same (.3);Confer with Counsel for Boal and Quotient re response to Fader letter objecting to settlement and claiming ownership of settled claims (.4); confer with T. Meade re same (.1).	1.00	1395.00	\$1,395.00
11/09/2022	KHB	ME	Work on response to objection to Boal settlement (.5); emails with M. Manning re same (.2).	0.70	1395.00	\$976.50
11/10/2022	KHB	ME	Review memorandum decision (.1); confer with M. Manning re submission of orders (.1); work on tax order (.2); work on orders approving settlement and contingency fee (.7); emails with T. Meade re same (.2); review objection by creditor (.2); work on response to objection (.3); emails with Trustee and T. Meade re response to objection (.2); confer with court deputy re late filed objection (.1); emails from counsel for Boal and Quotient re proposed order (.2).	2.30	1395.00	\$3,208.50
11/11/2022	KHB	ME	Emails with M. Kaplan re proposed order.	0.30	1395.00	\$418.50
11/14/2022	KHB	ME	Work on proposed order approving settlement and letter to court re same (.4); emails with L. Kieve re approval of order (.2); emails with T. Meade re obtaining Fader approval (.2); confer with M. Manning re order (.1); emails with M. Manning re same (.1); emails with M. Caplan re proposed order (.2).	1.20	1395.00	\$1,674.00
11/15/2022	KHB	ME	Confer with T. Meade; T. Nagay and Trustee re Fader letter objecting to form of order (.3); review letter to court from L. Kieve re objection to form of order (.2); emails to T. Meade, T. Nagay and trustee re response to L. Kieve letter (.4); emails from B. Dooley and M. Kaplan re same (.2); email from court setting hearing (.1); call with trustee, T. Meade and T. Nagay re form of order (.4); emails with L. Kieve and T. Meade re form of order (.3); review court memorandum is response to Grady letter (.1).	2.00	1395.00	\$2,790.00
11/16/2022	KHB	ME	Confer with T. Meade and trustee re approach to	2.60	1395.00	\$3,627.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			hearing on form of order (.4); review Litigation Sharing Agreement, section 362, form of order, tentative ruling, Fader demand letter asserting control and ownership over estate property in preparation for hearing (1.0); emails with L. Kieve re tentative ruling (.2); emails with B. Dooley and M. Kaplan re tentative ruling and approach to the hearing (.6); emails T. Meade re same (.2); revise form of order and confer M. Manning re same (.2).			
11/17/2022	KHB	ME	Voice mail from Fader counsel re no notice of appeal and emails to counsel re same.	0.20	1395.00	\$279.00
11/18/2022	KHB	ME	Emails with M. Caplan re timing of settlement payment.	0.20	1395.00	\$279.00
11/26/2022	KHB	ME	Emails with L. Kieve re timing of distributions (.2); confer with L. Kieve re same (.1).	0.30	1395.00	\$418.50
				98.10		\$114,922.50

TOTAL SERVICES FOR THIS MATTER: **\$287,607.00**

Expenses

09/19/2019	LN	77354.00001 Lexis Charges for 09-19-19	15.88
09/30/2019	CL	77354.00001 CourtLink charges for 09-30-19	6.42
10/10/2019	LN	77354.00001 Lexis Charges for 10-10-19	31.24
10/28/2019	CL	77354.00001 CourtLink charges for 10-28-19	1.71
11/20/2019	CL	77354.00001 CourtLink charges for 11-20-19	2.39
12/13/2019	LN	77354.00001 Lexis Charges for 12-13-19	48.07
12/13/2019	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
12/16/2019	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/17/2019	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
12/17/2019	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
12/18/2019	CC	Conference Call [E105] AT&T Conference Call, KHB	0.11
12/18/2019	CC	Conference Call [E105] AT&T Conference Call, KHB	1.56
12/19/2019	CC	Conference Call [E105] AT&T Conference Call, KHB	2.46
01/07/2020	PO	Postage [E108] Postage	69.00
01/07/2020	PO	Postage [E108] Postage	4.35
01/07/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
01/07/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
01/07/2020	RE2	SCAN/COPY (276 @0.10 PER PG)	27.60
01/07/2020	RE2	SCAN/COPY (72 @0.10 PER PG)	7.20
01/07/2020	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
01/07/2020	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
01/07/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
01/07/2020	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
01/07/2020	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
01/07/2020	RE2	SCAN/COPY (138 @0.10 PER PG)	13.80
01/07/2020	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
01/07/2020	RE2	SCAN/COPY (141 @0.10 PER PG)	14.10
01/07/2020	RE2	SCAN/COPY (138 @0.10 PER PG)	13.80
01/07/2020	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
01/07/2020	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
01/07/2020	RE2	SCAN/COPY (100 @0.10 PER PG)	10.00
01/27/2020	CC	Conference Call [E105] AT&T Conference Call, MPM	8.92

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01/27/2020	LN	77354.00001 Lexis Charges for 01-27-20	23.11
01/27/2020	LN	77354.00001 Lexis Charges for 01-27-20	23.59
01/27/2020	OS	Specialized Legal Service, Inv. P178966, O. Carpio	55.00
01/27/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
01/27/2020	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
01/27/2020	RE2	SCAN/COPY (9 @0.10 PER PG)	0.90
01/27/2020	RE2	SCAN/COPY (36 @0.10 PER PG)	3.60
01/28/2020	RE2	SCAN/COPY (10 @0.10 PER PG)	1.00
01/30/2020	CL	77354.00001 CourtLink charges for 01-30-20	1.83
01/30/2020	OS	Specialized Legal Service, Inv. P179051, O. Carpio	27.50
01/30/2020	OS	Specialized Legal Service, Inv. P179052, O. Carpio	45.00
01/30/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
01/30/2020	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
01/30/2020	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
01/30/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
01/30/2020	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
01/30/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
01/30/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
01/30/2020	RE2	SCAN/COPY (125 @0.10 PER PG)	12.50
01/30/2020	RE2	SCAN/COPY (32 @0.10 PER PG)	3.20
01/30/2020	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
01/30/2020	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
01/30/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
01/30/2020	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
01/30/2020	RE2	SCAN/COPY (7 @0.10 PER PG)	0.70
01/31/2020	AT	Auto Travel Expense [E109] Uber Transportation Services, KHB0	14.25
02/10/2020	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
02/20/2020	TR	Transcript [E116] Susan palmer, Inv. BR 0830119.1c, H. Phan	41.40
02/28/2020	PO	Postage [E108] Postage	1.00
04/07/2020	CL	77354.00001 CourtLink charges for 04-07-20	0.59
05/18/2020	CL	77354.00001 CourtLink charges for 05-18-20	0.85
09/16/2020	LN	77354.00001 Lexis Charges for 09-16-20	33.60
09/17/2020	CC	Conference Call [E105] AT&T Conference Call, KHB	6.44

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09/28/2020	LN	77354.00001 Lexis Charges for 09-28-20	75.59
11/23/2020	LN	77354.00001 Lexis Charges for 11-23-20	19.15
12/07/2020	LN	77354.00001 Lexis Charges for 12-07-20	60.02
12/08/2020	LN	77354.00001 Lexis Charges for 12-08-20	8.94
12/09/2020	LN	77354.00001 Lexis Charges for 12-09-20	28.96
08/17/2022	LN	77354.00001 Lexis Charges for 08-17-22	11.22
09/09/2022	LN	77354.00001 Lexis Charges for 09-09-22	9.35
09/13/2022	LN	77354.00001 Lexis Charges for 09-13-22	46.74
10/13/2022	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
10/13/2022	RE2	SCAN/COPY (137 @0.10 PER PG)	13.70
10/13/2022	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
10/19/2022	PO	U.S. Postage	81.51
10/19/2022	PO	Postage [E108] Postage	4.80
10/19/2022	RE2	SCAN/COPY (42 @0.10 PER PG)	4.20
10/19/2022	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
10/19/2022	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
10/19/2022	RE2	SCAN/COPY (564 @0.10 PER PG)	56.40
10/19/2022	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
10/19/2022	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
10/19/2022	RE2	SCAN/COPY (32 @0.10 PER PG)	3.20
10/19/2022	RE2	SCAN/COPY (26 @0.10 PER PG)	2.60
10/19/2022	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
10/19/2022	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
10/19/2022	RE2	SCAN/COPY (35 @0.10 PER PG)	3.50
10/20/2022	PO	Postage [E108] Postage	0.57
10/21/2022	PO	U.S. Postage	80.72
10/21/2022	PO	Postage [E108] Postage	1.62
10/21/2022	RE	(300 @0.20 PER PG)	60.00
10/21/2022	RE	(299 @0.20 PER PG)	59.80
10/21/2022	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
10/21/2022	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
10/21/2022	RE2	SCAN/COPY (278 @0.10 PER PG)	27.80
10/21/2022	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
10/21/2022	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40

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10/21/2022	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
10/21/2022	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
10/21/2022	RE2	SCAN/COPY (139 @0.10 PER PG)	13.90
10/21/2022	RE2	SCAN/COPY (139 @0.10 PER PG)	13.90
10/21/2022	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
10/21/2022	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
10/21/2022	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
10/25/2022	PO	U.S. Postage	74.73
10/25/2022	RE2	SCAN/COPY (141 @0.10 PER PG)	14.10
10/25/2022	RE2	SCAN/COPY (423 @0.10 PER PG)	42.30
11/28/2022	PAC	Pacer - Court Research	220.90
Total Expenses for this Matter			\$1,652.09

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REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 11/28/2022

Total Fees	\$287,607.00
Total Expenses	1,652.09
Total Due on Current Invoice	\$289,259.09
Outstanding Balance from prior invoices as of 11/28/2022	(May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
Total Amount Due on Current and Prior Invoices: \$289,259.09				

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA

EXHIBIT D



One Sansome Street
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San Francisco, CA 94104

EDUCATION

University of California at
Santa Barbara (B.A., with
high honors, 1977)

Hastings College of Law,
University of California (J.D.
1981)

BAR AND COURT ADMISSIONS

1981, California

Kenneth H. Brown

Tel: 415.263.7000 | kbrown@pszjlaw.com

Mr. Brown has extensive experience in bankruptcy and commercial litigation. He has represented and advised debtors, unsecured creditors, secured creditors, insurers, creditors' committees, and trustees in large complex chapter 11 and chapter 15 cases and in related litigation in both state and federal court. Mr. Brown leads the firm's litigation team in representations of the sex-abuse survivor committees in the chapter 11 bankruptcy cases involving the Roman Catholic Church. These matters involve the intersection of the First Amendment and the Religious Freedom Restoration Act ("RFRA") with Bankruptcy Code and focus on recovering assets transferred by the debtor prior to filing bankruptcy as part of asset protection scheme to protect the assets from the claims of the victims of sex abuse. The representations also require expertise in identifying, analyzing, and prosecuting claims against the management of the debtor for allowing or facilitating the sexual misconduct and abuse. Mr. Brown led the team that obtained a judgment in one of these cases worth in excess of \$100 million. Mr. Brown also specializes in defending employers in WARN Act class-action litigation and advising them on the intersection of the WARN Act and bankruptcy. Mr. Brown also has extensive experience representing professional firms and their principals in dissolutions and bankruptcies.

He is a graduate of U.C. Santa Barbara and received his J.D. at Hastings College of the Law, where he was articles editor for the *Hastings Law Journal*. Mr. Brown is a former director of the Bay Area Bankruptcy Forum, a former member of the State Bar of California Business Law Section Subcommittee on Debtor/Creditor Relations and Bankruptcy, and frequently serves as a mediator for the Bankruptcy Dispute Resolution Program for the Northern District of California and the San Francisco Bar Association. He holds an AV Preeminent Peer Rating, Martindale-Hubbell's highest recognition for ethical standards and legal ability. He has been listed in every edition of *Best Lawyers in America* since 2018 for his work in Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law and Litigation - Bankruptcy. Mr. Brown is admitted to practice in California and is resident in our San Francisco office.

Representations

Law firm bankruptcies: Brobeck, Phleger & Harrison; Heller Ehrman, Landels Ripley & Diamond

Creditors' committees in Boy Scouts of America; TK Holdings Inc. (Takata Americas); The Weinstein Company ; USA Gymnastics

Committees in Catholic church bankruptcies: Christian Brothers Institute; Archdiocese of Santa Fe; Archdiocese of Milwaukee; Catholic Diocese of Fairbanks; Catholic Diocese of Wilmington; Diocese of Great Falls; Roman Catholic Diocese of Rochester; Roman Catholic Diocese of San Diego

Cross-border case: Katsumi Iida

Professional Affiliations

Director, Bay Area Bankruptcy Forum (2001-)

Mediator, San Francisco Bar Association, Early Settlement Program (1997-2003)

Bankruptcy Dispute Resolution Program, United States Bankruptcy Court for the Northern District of California (1994-)

Member, State Bar of California Business Law Section Debtor/Creditor Committee (1999-2002)

Programs and Lectures

Lecturer, American Bankruptcy Institute; Association of Insolvency & Restructuring Advisors; Bar Association of San Francisco; Santa Clara County Bar Association

Publications

The Estate's Potential Claims Against Management for Failure to Prevent Sexual Misconduct

356 American Bankruptcy Trustee Journal 30 (No. 3 Summer 2019), September 2019

Stranger in Paradise? The Role of a Foreign Bankruptcy Trustee in Chapter 15

27 ABI Journal No. 3 at 26 (April 2008), April 2008

"Discovery in Debt Collection Actions," in *Debt Collection Practice in California* (2d ed. 2000)

"Tenants in Distress: Pitfalls and Opportunities for the Retail Landlord," *Shopping Center Business* (1998).

"Law Firm Break-Ups and Bankruptcies," 3 *Legal Malpractice Report* (No. 2 1992)



Kenneth H. Brown (Cont.)

Co-author, "Dissolutions of Professional Firms Under State Law," in program materials for the Third Annual Northwest Bankruptcy Institute (1989)



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EDUCATION

Brown University (A.B., *magna cum laude*, 1982)

Southwestern Law School (J.D., *magna cum laude*, 1986)

BAR AND COURT ADMISSIONS

1986, California

Henry C. Kevane

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Mr. Kevane is the managing partner of the firm's San Francisco office. He has worked on transactional and bankruptcy matters with clients from a variety of industries. In 2011, the *Daily Journal* profiled him in a special supplement as one of the top 25 municipal lawyers in California for his work in chapter 9 bankruptcy cases. Mr. Kevane was inducted into the American College of Bankruptcy as a fellow in 2015. In 2020, he was selected as a fellow of the American Bar Foundation, a global honorary society of lawyers, judges, law faculty, and legal scholars who have demonstrated outstanding dedication to the highest principles of the legal profession and to the welfare of society. Mr. Kevane is a graduate of Brown University and received his J.D. from Southwestern Law School, where he was editor-in-chief of the *Southwestern University Law Review*. He was listed by *Lawdragon* as one of the 2022 "500 Leading U.S. Bankruptcy & Restructuring Lawyers" and one of the 2020 "500 Leading Global Restructuring & Insolvency Lawyers." He also holds an AV Preeminent Peer Rating, Martindale-Hubbell's highest recognition for ethical standards and legal ability; has been listed in *Best Lawyers in America* for Bankruptcy and Creditor Debtor Rights & Litigation - Bankruptcy since 2006; and has been listed in *Northern California Super Lawyers* for his work in bankruptcy law since 2004. Mr. Kevane is admitted to practice in California.

Representations

Creditors' committees in SeraCare Life Sciences, Guy F. Atkinson Company, America West Airlines

Chapter 11 debtors in CarbonLite, Verity Health System, Deltagen, Thorpe Insulation, Point Blank Solutions, Champion Enterprises, Aegis Mortgage, Yipes Communications, E/O Networks, Worlds of Wonder, Frederick & Nelson

Creditors' committees in the municipal restructurings of the County of Orange, Heffernan Memorial Hospital District (Calexico, California), Palm Drive Healthcare District, West Contra Costa Healthcare District, Valley Health System, Adair County Hospital District (Kentucky)

Debtor's counsel to Mendocino Coast Health Care District in its chapter 9 case

Professional Affiliations

Fellow, American College of Bankruptcy

Fellow, American Bar Foundation

Vice-chair, Business Bankruptcy Committee of the ABA Business Law Section (2020 - present)

Chair, Asset Forfeiture & Bankruptcy Subcommittee of the Bankruptcy Study & Policy Committee of the ABA Business Law Section (2017-present)

Co-chair, Programs Subcommittee of the Business Bankruptcy Committee of the ABA Business Law Section (2015-2020)

Chair, Legislative Subcommittee of the Business Bankruptcy Committee of the ABA Business Law Section (2014-15)

Chair, Bankruptcy Committees Subcommittee of the Business Bankruptcy Committee of the ABA Business Law Section (2013-14)

Vice-chair, Individual Chapter 11 Subcommittee of the Business Bankruptcy Committee of the ABA Business Law Section (2011-13)

Director, *Business Law Today* (ABA Business Law Section)

Chair, State Bar of California Committee on Federal Courts (1996-2001)

Chair, State Bar of California Business Law Section Insolvency Law Committee (1995-1999)

Programs and Lectures

American Bankruptcy Institute, American Intellectual Property Law Association, American Conference Institute, ALI/ABA, Association of Insolvency & Restructuring Advisors

Publications

Cross-Border Municipal Bankruptcy Cases—Wait. What? Rewind. *Business Law Today* (August 2021)

Recoupment—Back in Its Bankruptcy Box *Business Law Today* (June 2021)

Asset Forfeiture and Insolvency: A Parallel Case Management Guide
American Bar Association Business Law Section (October 2019)

Is a Bankruptcy Court's Determination of Insider Status Reviewed Under the Rigorous De Novo Standard or the More Deferential Clear-Error Standard?
45 ABA PREVIEW of United States Supreme Court Cases 42 (2017)

Does the FDCPA Cover a Party That Purchases Defaulted Debt for Its Own Account?

44 ABA PREVIEW of United States Supreme Court Cases 218 (2017)

Does the Bankruptcy Code Preclude Puerto Rico From Adopting a Local Insolvency Scheme for Restructuring the Debts of Its Public Utilities?
43 ABA PREVIEW of United States Supreme Court Cases 200 (2016)

Legislative Update: "Indicative Rulings" Under New Bankruptcy Rule 8008
ABA Business Bankruptcy Committee e-Newsletter (July 2015)

No More Ad Lib: The Nuts and Bolts of Ad Hoc Committees
Business Law Today (December 2014)

Legislative Update: Senate Bill 2418
Bankruptcy Fairness and Employee Benefits Protection Act
ABA Business Bankruptcy Committee e-Newsletter (June 2014)

Bond Insurers Become Active Participants in Chapter 9s
26 Journal of Corporate Renewal 24 (May 2013)

Debtor-in-Possession Financing
Funding a Chapter 11 Case
American Bankruptcy Institute (2012)

What Just Happened? How Asset Forfeiture Affects Bankruptcy Distributions
Business Law Today (June 2012)

Legislative Update: California Assembly Bill 506 on Bankruptcy Code Chapter 9 Eligibility
ABA Business Bankruptcy Committee e-Newsletter (January 2012)

Deploying the "Prepackaged" Plan of Adjustment in Chapter 9
Chapter 9 Bankruptcy Strategies
Thomson Reuters (2011)

Across the Border: IP Entanglements in Chapter 15 Bankruptcies
May 2011

Chapter 9 Municipal Bankruptcy – The New "New Thing"?
Parts I & II
Business Law Today (May and June 2011)

Legislative Solutions in the Orange County Chapter 9 Case
The Aftermath of Bankruptcy: Legislative Reform—State and Federal (1996)

The Treatment of Financing Leases in a Chapter 9 Bankruptcy Case
Parts I & II
AGLF Tax-Exempt Leasing Letter (1995 & 1996)

"The Legislative Side of the Orange County Chapter 9 Case" for Sacramento

County Bar Association (1996)

"Now What? Three Questions Facing the Municipal Bondholder Upon Commencement of a Chapter 9 Case," published in course handbook, *Municipal Bond Law for the Bankruptcy Practitioner* (1996)

"Fee Shifting by (1) Oversecured Creditors in Bankruptcy Cases & (2) Prevailing Parties in Civil Litigation," published in course handbook *Getting Paid What You Are Worth* (1996)

"The Newsgatherer's Shield: Why Waste Space in the California Constitution?" 15 *Southwestern University Law Review* 527 (1985)

Coauthor, "Principles of Equitable Subordination Under Section 510 of the Bankruptcy Code," in *Selected Issues in Bankruptcy Practice* (Calif. Contin. Ed. Bar 1991)

Contributing author, *Bankruptcy Practice: Annual Recent Developments* (Calif. Contin. Ed. Bar 1992-1998)



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EDUCATION

University of California at
Berkeley (A.B. 1990)

University of San Francisco
(J.D. 1995)

BAR AND COURT ADMISSIONS

California, 1995

Miriam Manning

Tel: 415.263.7000 | mmanning@pszjlaw.com

Ms. Manning has more than ten years of experience representing debtors, creditors, and trustees in various aspects of insolvency proceedings including acquisitions, divestitures, and litigation. She is a graduate of University of California at Berkeley and received her J.D. from the University of San Francisco School of Law. She has held leadership positions with the San Francisco Bar Association and is a dedicated community volunteer. Ms. Manning holds an AV Preeminent Peer Rating, Martindale-Hubbell's highest recognition for ethical standards and legal ability and is listed in the 2019 edition of *Best Lawyers in America* for her work in Bankruptcy and Creditor Debtor Rights/Insolvency and Reorganization Law. Ms. Manning is admitted to practice in California and is resident in our San Francisco office.

Professional Affiliations

Board Member, Bay Area Network, International Women's Insolvency & Restructuring Confederation (2006-)

Chair and Vice-Chair, Bar Association of San Francisco, Bankruptcy and Commercial Law Section (2005-2006)

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA

EXHIBIT E

TRUSTEE'S STATEMENT OF REVIEW OF FEE APPLICATION

(U.S. Trustee Guidelines ¶ 2.2.2)

I, E. Lynn Schoenmann, hereby certify that I have read the foregoing fee application of Pachulski Stang Ziehl & Jones LLP, attorneys for me as Trustee in the bankruptcy case of Peter R. Fader, case number 08-30119-DM, and I have no objections to that fee application or the fees and costs requested therein.

~~E. Lynn Sehoenmann~~

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA